

Joint questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)

The Panel directed:

Any submitter and Queenstown Lakes District Council may provide written questions they seek to be asked of the expert(s) electronically to the Hearing Administrator by 12pm (noon) 17 November 2023.

Any such questions shall:

- (a) clearly identify the name of the submitter asking the question;
- (b) relate to a specific issue raised in the submitter's submission (a cross reference to the issue in the submission shall be provided) and to a matter within the scope of, and relevant to, the hearing;
- (c) clearly identify which expert(s) the question(s) relate to with reference to the relevant paragraph of their evidence the question relates;
- (d) be a question and not a statement; and
- (e) be succinct, clearly numbered, clearly identify the issue to be addressed by the expert and be within that expert's expertise.

In many instances, the questions arise more from the rebuttal evidence of the relevant witness, and in some cases from an issue that has emerged as a consequence of the submitter's original submission or wider issues, and so it has not been practical to refer back to the submission each time.

In the time available, given that significant expert input was sought in developing the questions, there may be some overlap in the questions, and some of the questions may be out of order or sequence.

It is hoped that the questions will still be accepted, and forwarded to the relevant witnesses for their responses.

Joint questions on behalf of Glenpanel Developments Limited (73) and Anna Hutchinson Family Trust (107)				
#	Issue	Cross reference to submission(s); or Expert's evidence	Expert(s) question is to be put to	Question
Broad Topic: Stormwater				
1.	Stormwater, Lake Hayes	Amy Prestidge EIR, [17](c)	Amy Prestidge	Do you agree that the proposed post-development stormwater discharge to Lake Hayes will be reduced from existing pre-development flows, as a result of the stormwater requirements proposed for the TPLM Variation area?
2.	Stormwater, Lake Hayes	Amy Prestidge EIR, [31]-[46]	Amy Prestidge	Do you agree that:

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				<p>(a) the TPLM Variation area is an extremely small portion of the catchment?</p> <p>(b) Due to high infiltration rates on the flats, the inflows to the Lake from the development to be enabled is extremely low in comparison to all other tributaries?; and</p> <p>(c) Mill Creek on the opposite end of the lake is the "predominant source of water to the lake" as stated in the Lake Hayes State of Environment 2023?</p> <p>(d) the stormwater solutions proposed by the TPLM Variation area will not exacerbate any existing problems within Lakes Hayes?</p>
3.	Stormwater integration (not centralisation)	Amy Prestidge EIR, [18](a)	Amy Prestidge	Do you agree that a fully integrated stormwater solution does not require a single centralised stormwater system, but can consist of related components that can collectively be more effective by virtue of having similar approaches and which may share close proximity to high infiltrating soils?
4.	Stormwater Management Guideline	John Gardiner EIR, [9](a), [10].	John Gardiner	<p>Do you intend for:</p> <p>(a) the proposed SMG to serve as an informational guidance to QLDC and Landowners about possible stormwater approaches that may be suitable for different circumstances, or as a requirement that must be met:</p> <p>(b) the SMG to be this be developed by QLDC alone, or will landowners (and</p>

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				their experts) have input into the contents of the SMG?
5.	Integrated stormwater solution	John Gardiner EIR, [17]	John Gardiner	While the development of a SMG is ideal, do you agree, in its absence: (a) QLDC would be capable of working with individual land owners to collaboratively ensure an integrated stormwater solution?; and (b) an Integrated Stormwater Assessment could be done via information requirements or matters of discretion.
6.	Size of stormwater devices	John Gardiner EIR, [9](c).	John Gardiner	When you say that "it is also sensible to minimise the size of devices", do you agree that: (a) there is a correlation between the infiltration rates of the soils and the volumetric requirements to attenuate flows (sizing) based on the catchment area for each device; and (b) the sizes will accordingly not be any less than that which is determined by engineering design for each device?
7.	Swale solutions	John Gardiner EIR, [9](d) and (e)	John Gardiner	Do you agree that: (a) the provision of a swale which is designed for infiltration to land at an elevation below a nominal 'crust' of 1.5-2.5m, will serve as an acceptable solution for the disposal of stormwater from Slope Hill; and (b) that any stormwater that does not infiltrate into the soils will be routed towards Lake Hayes in accordance with existing conditions; and

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				(c) systems that are interconnected by pipes will naturally convey stormwater to the lowest point, and may not achieve the optimal disposal rate for the overall site on account of inequitable distribution of stormwater from 'uphill' properties to those which are 'downhill'.
8.	Stormwater integration/ connectivity	John Gardiner EIR, [9](h)	John Gardiner	Do you agree that: (a) a "coordinated planning framework" (included any SMG) should allow for some flexibility?; and (b) the word 'connected' refers to the overall approach of disposing of stormwater to land, and not to the piped connection of different stormwater devices?
9.	Stormwater flexibility	John Gardiner EIR, [9](i) and (j)	John Gardiner	Do you agree that: (a) each land parcel within the TPLM Variation area is a different size and different orientation, and while there may be similarities in topography and geotechnical profile, each parcel is different from the others? (b) each landowner is likely to develop their land at a time and rate that is largely independent of any other landowner? (c) therefore, a flexible approach is required, rather than a prescriptive one prepared without the benefit of subsequent investigation and design

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				that fully accounts for the unique features and plans for each site?
10.	Cost of stormwater devices	John Gardiner EIR, [12](b)	John Gardiner	Do you agree that: (a) the value of land has a significant bearing on a developers willingness to consider underground storage in lieu of at-grade stormwater solution; (b) there is a finite amount of land that is suitable for housing development, and at-grade stormwater solutions will reduce the number of sections that can be sold as compared to any stormwater solution that only utilises the road corridors; and (c) there is insufficient information to determine whether any specific stormwater solution would be advantageous or cost prohibitive on any TPLM site at this stage?
11.	Stormwater devices in road reserve	John Gardiner EIR, [12](c)	John Gardiner	Do you agree that: (a) other councils have utilised or allowed underground stormwater disposal devices, including in road reserve? (b) it is possible to locate an underground stormwater device within a road corridor that does not require the excavation of the road for maintenance, and with good design can be maintained with minimal interruption to traffic?
12.	Number of stormwater devices	John Gardiner EIR, [19]	John Gardiner	Do you agree: (a) with the Rebuttal evidence of Jeffrey Brown (10 November 2023) paragraph

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				[28], which proposes the wording of "minimising the number of devices within the integrated system"?; and (b) that QLDC can work with individual land owners to achieve this goal of minimising the number of devices (without specifying a specific number)?
Broad Topic: Traffic and Transportation				
13.	Density and total population requirements from a transport perspective		Colin Shields	Please confirm your opinion, from a transport perspective: (a) what the density and total population within the TPLM area is that is "needed" to support the overall transport outcomes (including public transport alignment with the Queenstown Business Case PT network through and destined for the TPLM area); and (b) whether, if that density and/ or total population were exceeded, whether that would further support the overall transport outcomes, rather than undermine them.
14.	Whether density agreed to was intended to be gross or net?	JWS Transport, Ladies Mile Property syndicate submission and whether minimum density of 60 dwellings per hectare is required for TPLM transport strategy	Colin Shields	When you said that "at least 40-60 d/ha is required for effective mode shift", were you referring to gross or net, and, if net, what assumptions you were using in terms of land excluded? (This is for clarification as Mr Brown suggests at EIR [137] that you were using a gross figure.)

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15.	2,400 residential unit "cap"	Colin Shields' EIC, [38] Planning JWS(1), Traffic and density minima.	Colin Shields	<p>Mr Shields records that the 2,400 unit figure was used for modelling, as it was "an upper level of units which, at that time in the development of the TPLM Masterplan, was considered to be deliverable". Bruce Harland Harland now says there is "an overall agreed dwelling cap of 2,400 that can be supported by the transport modelling".</p> <p>Please confirm your opinion as to:</p> <ul style="list-style-type: none"> (a) whether you consider the 2,400 unit figure to be a "cap"; (b) what the consequences would be, from a traffic perspective, if the 2,400 unit figure if development: <ul style="list-style-type: none"> (i) falls well short of that figure (eg because the density sought to be required is not realised); and/ (ii) exceeds that figure, particularly in light of the anticipated modal shift, signalised intersections, and reduced 60km/hour speed limit.
16.	2,400 residential unit "cap"	Bruce Harland EIR, [13](b)	Bruce Harland	When you say that there is "an overall agreed dwelling cap of 2,400 that can be supported by the transport modelling", who has agreed to this being a "cap", and where is your evidence for this?
17.	Increased pedestrian and cycle	Colin Shields' EIR, [17]	Colin Shields	Waka Kotahi's expert (Dave Smith) is recommending signals be established at Lower Shotover/Stalker and Howards and the

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	movements between north and south TPLM and potential reductions in vehicle generation, including across the Shotover Bridge			<p>highway be subject to a reduced 60km/h speed limit. This will enhance the safety and convenience for cross-highway movement, and potentially reduce vehicle generation of movement between the northern and southern side of the Variation/TPLM area.</p> <p>Please confirm your opinion, on:</p> <ul style="list-style-type: none"> (a) whether increased pedestrian (and cycle) movements between north and south sides of the TPLM is likely to occur; (b) if so, whether this is likely to beneficially affect (ie reduce) the external vehicle generation across the highway, and potentially also across the Shotover Bridge; and (c) if so, how could these crossing points be best optimised to increase the safety, convenience and perceived amenity for pedestrians (and cyclists).
18.	Quantification of signalisation and reduced 60km/h speed limit on network capacity	Colin Shields' EIR, [14], [15]	Colin Shields	<p>Please confirm:</p> <ul style="list-style-type: none"> (a) That no network or corridor modelling has been undertaken to quantify the change (improvement) in network capacity arising from the proposed signalisation and reduced 60km/h speed limit; (b) Whether any such further assessment would be helpful, and if it can be undertaken; and (c) With such an assessment, if undertaken, or without, your opinion

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				on the extent to which the proposed signalisation and reduced 60km/h speed limit will increase capacity.
19.	Consequences of the Ladies Mile SH6 corridor being a Rapid Transport Service.	Planning JWS (1), Is the LM SH6 corridor becoming Rapid Transport Service (RTS) as part of TPLM	Colin Shields	<p>The planning experts agreed that it will be a RTS under NPS-UD. Do you agree that this therefore means that:</p> <ul style="list-style-type: none"> (a) greater intensification is anticipated around Rapid Transit Stops (and that building setbacks would also need to be reduced); and (b) people can be anticipated to walk to such for up to at least 10 minutes (800m) and, potentially, 15 minutes (1,200m); (c) it is inappropriate to provide a slip lane in the 'Amenity Access Area', for local vehicle access (and associated private accessways / car parking) in the SH6 cross section; (d) in each case, if not, why not; and (e) even if <i>you</i> do not agree, that NZTA might have this expectation to enable the best use of the RTS and its Rapid Transit Stops on its State Highway?
20.	Consequences of the Ladies Mile SH6 corridor being a Rapid Transport Service.	Planning JWS (1), Is the LM SH6 corridor becoming Rapid Transport Service (RTS) as part of TPLM	Dave Smith Jeff Brown	<p>The planning experts agreed that it will be a RTS under NPS-UD. Do you agree that this therefore means that:</p> <ul style="list-style-type: none"> (a) greater intensification is anticipated around Rapid Transit Stops (and that building setbacks would also need to be reduced); and (b) people can be anticipated to walk to such for up to at least 10 minutes

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				(800m) and, potentially, 15 minutes (1,200m); and (c) if not, why not; and (d) Is the inclusion of an 'Amenity Access Area', providing for a slip lane for local vehicle access (and associated private accessways and car parking) in the cross section, conducive to the accessible public transport and active travel outcomes sought for the SH6 corridor?
21.	Walkable catchments		Jeff Brown	Do you agree that a walkable catchment of 400 metres is typically associated with a five-minute average walk and 800 metres with a 10-minute average walk?
22.	Consequential transport changes, <u>if</u> the western extension area sought by the Hutchinsons' were to be included in the TPLM Variation		Colin Shields	<u>If</u> the Panel were minded to include the extension area, what changes to the western end of the TPLM Variation would you recommend to best integrate the extension area from a traffic and transportation perspective. In particular, do you agree that the realignment of the collector road as tabled by AHFT would: (a) support the development of the town centre area? (b) help mitigate impacts on the SH; and (c) reinforce modal shift outcomes at the western end?
Broad Topic: Landscape / urban design				
23.	Views to Slope Hill from Stalker	Bruce Harland EIR, [31](b)	Bruce Harland	You raise a need to "maintain views from the Stalker intersection to Slope Hill". What are

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	Road intersection			the important view shaft qualities that you are seeking to remain?
24.	Consequences of the SH6 setbacks	Stuart Dun EIR, [23,26]	Stuart Dun	<p>The planning experts agreed that it will be a RTS under NPS-UD and that you recognise SH6 is intended to be an Urban Connector with a high movement and place function under the One Network Framework. As such, do you agree that:</p> <ul style="list-style-type: none"> (a) the four CPTED principles of surveillance (e.g. active frontages), access management, territorial reinforcement (e.g. sense of ownership) and quality environment (e.g. cost effective extent and ongoing maintenance) need to be applied effectively for users within and adjacent to the proposed cross section and planning provisions within the variation, and, if so, do you agree that this requires modification to what is currently proposed? (b) the inclusion of an 'Amenity Access Area' that provides for a slip lane for local vehicle access (and associated crossing points, private accessways and car parking) in the cross section is conducive to the accessible public transport and active travel outcomes sought for the SH6 corridor; (c) a 70m crossing of the proposed SH6 corridor is best optimised to reduce severance and increase the perceived convenience for pedestrians (and

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				<p>cyclists) moving between north and south parts of the Te Pūtahi / Eastern Corridor; and</p> <p>(d) if so, does the relative prioritisation of a proposed consistent and spacious gateway and arrival sequence remain higher and / or compatible with the above from an urban design perspective?</p>
25.	Location of retail/ commercial	Stuart Dun EIR, [24]	Stuart Dun	<p>Given the recent update with respect to the lower design speed (60km/hr), the two signalised intersections (Lower Shotover Road and Howards Drive) and confirmed location of Rapid Transit stops on the western side of these, do you agree:</p> <p>(a) that a larger north-side highway curtilage to accommodate a road (access lane) is now no longer an appropriate response?, and that reduced setbacks commensurate with an urban frontage is now more appropriate?;</p> <p>(b) the commercial area in, and associated higher density residential around it, may now not be optimally located with respect to the Howards Drive highway crossing point and the objective of integrating the sports hub as part of a complete, centrally located town centre?; and</p> <p>(c) that in any event, and/or if the town centre and associated higher density</p>

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				residential is to remain in its proposed location, that another small urban amenity node with appropriate residential densities at the western intersection (Lower Shotover Road) is now appropriate?
26.	Nature, timing and scale of development	Bruce Harland EIR, [11]-[12], [19]	Bruce Harland	<p>While accepting that the Council is now planning Rapid Transit Stops, you do not specifically acknowledge if the Council is pursuing a Transit Orientated Development (TOD) growth strategy for the TPLM eastern growth corridor.</p> <p>Please confirm:</p> <ul style="list-style-type: none"> (a) whether the Council is pursuing a Transit Orientated Development (TOD) growth strategy for the TPLM eastern growth corridor; (b) If so, whether the Rapid Transit stop now planned west of the Lower Shotover / Stalker Road intersection meet the criteria for TOD-style intensification; and (c) given: <ul style="list-style-type: none"> (i) the guidance now provided by all transport experts that the SH6 corridor is to be 'urbanised', some 30 years ahead (2053 as per paragraph 54(c) of Colin Shields Evidence) of that anticipated in the Transport Business Case, and (ii) Economic evidence from Adam Thompson, Tim Heath and Phil

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				<p>Obsorne that a TOD-based development approach would support increased area for, and quantum of, commercial activity: Whether you consider constraining commercial activity to the town centre remains the most appropriate response?</p>
27.	Density and height	Stuart Dun EIR, [40]-[41]	Stuart Dun	<p>Do you accept that:</p> <ul style="list-style-type: none"> (a) The 2,400 dwellings is not a design capacity per se, but simply a constraint on further development until further infrastructure solutions are implemented? (b) The location, size and form of schools cannot be guaranteed and therefore: <ul style="list-style-type: none"> (i) The masterplan should not be unduly influenced by 'likely' school positions? and; (ii) That best practice urban design principles and practise should prevail? (c) Two of the most critical objective are to: <ul style="list-style-type: none"> (i) Deliver an agreed minimum residential density to support public Rapid Transit services? and (ii) Encourage higher density outcomes in appropriate locations, principally focussed Rapid Transit nodes /stops?

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				(d) Consequently, the highest urban amenity should provided along the SH corridor; and concentrated around transit nodes?
28.	Consequential urban design changes, <u>if</u> the western extension area sought by the Hutchinsons' were to be included in the TPLM Variation		Bruce Harland	<p><u>If</u> the Panel were minded to include the extension area</p> <p>(a) what further amendments or alternative layouts (represented graphically) would you recommend as an urban design expert that would better integrate the transport connections, any minor additional neighbourhood centre and higher density residential to its western end?; and</p> <p>(b) do you consider the further inclusion of a minor additional neighbourhood centre, if closely associated with the western rapid transit stop, would provide sufficient 'pulling power' for residents to walk up to 800m?</p>
29.	Accessibility to Te Kirikiri / Frankton Metropolitan Centre	Bruce Harland EIR, [20]	Bruce Harland	<u>If</u> the Panel were minded to include the extension area, would you consider this to be within a 15 minute catchment to Te Kirikiri / Frankton Metropolitan Centre, as defined under the well-recognised '15-Minute City' concept?
30.	Visual effects of the extension area	Steve Skelton EIR, [11]	Steve Skelton	<p>You say that the TPLM Variation area will not be visible from Quail Rise and other areas. Do you accept that:</p> <p>(iii) this is not correct: or</p> <p>(iv) is dependent on your selected viewing position, for example,</p>

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				Viewpoint 2 of Mr Milnes GA to his primary evidence. In respect of your conclusion that there are high adverse effects associated with "potential" skyline breaches from the ferry bridge, Queenstown Trail, and the Shotover River, what modelling, if any, have you undertaken to inform this opinion (taking into account the latest suite of proposed provisions).
31.	Impacts on views of the conical form of the ONF from SH6 and the west	Steve Skelton EIR, [12]-[14]	Steve Skelton	Please identify, on your EIR Figure 1, where the ONF line exists.
32.	LUC7 – Domain Road Shotover Terrace	Steve Skelton EIR, [17]-[21]	Steve Skelton	Do you accept that: (a) there is already built development between the extension area and the river's edge in this location; (b) the extension area is at the junction of three landscape units (as identified in the WBLUPS); and (c) when considering the extension area in the context of the Shotover Terraces (which have been severed by SH6) there is development on the lower terraces already.
33.	Are landscape effects a fatal flaw?	Jeff Brown EIE, [180]	Steve Skelton	Mr Brown considers that the Hutchinson land is appropriate for urban development in the future, including through a future urban zone, or inclusion within the next Spatial Plan.

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				Do you consider that the landscape opposition that you have, which cannot logically change in the future (since you have considered the future environment), are so great, and cannot be mitigated, so as to preclude any such future zoning for urban development?
34.	Competition	Susan Fairgary EIR, [95]	Susan Fairgray	To what extent do you consider your reservations about the timing and form of the urban development at the Western Extension Area: <ul style="list-style-type: none"> (a) are matters of trade competition, that should be ignored; or (b) alternatively, if the extended rezoning were to occur, that any competition in the market would actually be positive for quicker delivery of housing and/or at lower market values?
35.	Commercial activity at the western end		Jeff Brown	Do you agree that: <ul style="list-style-type: none"> (a) some shops could be developed towards the western end, say at [xx], under the current zone provisions as a RD activity?; and (b) so a small commercial centre towards the western end could eventuate, particularly if the extension area were to be included in the TPLM Variation?

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36.	Heritage considerations in contextual analysis	Robin Miller EIR [14], [17], [25]	Robin Miller	<p>You say that maintaining heritage features is one of the important contextual aspects of placemaking and that the study area extended from the Shotover River to Lake Hayes. Do you:</p> <ul style="list-style-type: none"> a) Consider that heritage attributes have been fully acknowledged and incorporated? b) Would this have been improved by including the expansion area?

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37.	Heritage attributes in placemaking	Stuart Dun EIR, [25](g)	Stuart Dunn	<p>You say that maintaining heritage features is one of the important contextual aspects of placemaking. In your opinion:</p> <ul style="list-style-type: none"> a) Do you consider that heritage attributes where given sufficient weight to this placemaking attribute? b) Would the masterplan have benefitted from incorporating heritage elements within the expansion area? c) Do you accept that: <ul style="list-style-type: none"> i. The Spence Road / Collector Road route provides that important heritage link which is substantially different to the urban Active Travel link along the SH? ii. Landscape attributes where deemed of higher order than urban heritage attributes expansion area (including the western heritage area and Old Shotover Bridge) is establishing the western masterplan extent?
38.	Risks of not including the extension area now	Jeff Brown EIE, [180]	Jeff Brown	You consider that the Hutchinson land is appropriate for urban development in the future, including through a future urban zone, or inclusion within the next Spatial Plan.

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#	Issue	Cross reference to submission(s); or Expert's evidence	Expert(s) question is to be put to	Question
				<p>Do you accept that:</p> <p>(a) If not rezoned now, then it will be some 5+ years before any rezoning would occur, at the earliest, having regard to:</p> <p>(i) The likely refusal of Council for any private plan change within 2 years, and the 2-3 year process for any private plan change commenced after the 2-year stand down period;</p> <p>(ii) The Landowner would be unlikely in any event, to re-invest in any private plan change process, having resourced this process so heavily;</p> <p>(iii) That if the landowner did not pursue a private plan change, the Council would be unlikely to do so, for at least 5+ years (and more likely, longer);</p> <p>(b) Accordingly, the most likely outcome, if the extension area is not rezoned now, is that the landowner will look to recover their costs of this failed process, through development of the land for lifestyle residential, consistent with the current zoning;</p> <p>(c) In that case, the ability to develop the extension area for urban development will be permanently lost; and</p>

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				<p>(d) Even if the extension area is not developed for lifestyle residential, by the time that it is to be rezoned, then, either:</p> <p>(i) the western end of the TPLM Variation may have been developed by that point, precluding appropriate integration; or</p> <p>(ii) the means of integrating will be a further imposition on the landowner of the relevant land at the time.</p>
Broad Topic: Landscape – Glenpanel (Note questions for Bridget Gilbert not provided, as her rebuttal has not been given)				
39.	Appropriateness of development on the ONF at the Glenpanel site		Steve Skelton	<p>Do you accept that:</p> <p>(a) you had previously indicated to Glenpanel Development Limited's Mark Tylden that you could support up to at least six residential sites on the ONF?; and</p> <p>(b) in any event, you are sufficiently familiar with the site to have a view on the relief sought in respect of the slight extension of the TPLM Variation area up the toe of the slope, with a corresponding shift in the ONF line, and the proposed location of the UGB; and</p> <p>(c) if so, you are able, and should, to best assist the Panel, give evidence as to your opinion on the relief sought.</p>

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Broad Topic: Planning				
40.	Planner's obligations		Jeff Brown	Do you accept that: (a) You are not obliged to adopt the evidence of every Council expert; and (b) You are able to accept or prefer the evidence of submitters' experts over that of a Council expert; (c) In determining what evidence to accept or prefer, you need to consider the usual tests for probative value, such as relevance, coherence, consistency, balance, insight, and impartiality?
41.	Credibility that there need be no change to the SH6 cross section diagram, as a consequence of the 60km/hour speed reduction	Jeff Brown EIR, [39]	Jeff Brown	Do you really consider it most appropriate to make no changes to the TPLM Variation as a consequence of confirmation that: (a) SH6 will be a Rapid Transit Service; (b) SH6 will be a 60km/ hour environment; and (c) SH6 will be subject to traffic lights.
42.	Consideration of incentives		Jeff Brown	To what extent have you considered the application of a base density requirement (say, 40 dwellings per ha), with enablement if not incentives, to encourage additional density, such as around the TPLM centre, around the Rapid Transit Stops, and Glenpanel Precinct etc, to best ensure that the overall density required for the transport mode shift, and urban design requirements, are met?

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				If not, could this be an appropriate way forward?
Glenpanel Planning matters				
43.	Location of the ONF	Jeff Brown EIR, [183]	Jeff Brown	<p>You state that you understand that the location of the ONF boundary is not within the scope of the TPLM Variation. Is this on instruction?</p> <p>As a Planner, do you accept that:</p> <ul style="list-style-type: none"> (a) The TPLM Variation must give effect to the NPS-UD, as well as Chapter 4 of the PDP as amended to give effect to the NPS-UD; (b) the map in ch 4 at 4.1.2, Figure 1, is small and is not designed to identify the precise boundaries of the "Indicative Future Expansion the Area", and that it does no more than signal the general area where the QLDC thinks urban expansion should occur; and (c) accordingly, the precise boundaries of the TPLM Variation Area must be available to consideration, with revision of the ONF as a consequential consideration, particularly if the evidence is that the ONF is actually located higher up the slope.
44.	Consent pathway for water tanks	Jeff Brown EIR, [185]-[189]	Jeff Brown	<p>Do you agree that:</p> <ul style="list-style-type: none"> (a) Where there are conflicts between competing policies, then they should

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				<p>be resolved at the plan stage rather than at the resource consent stage wherever possible;</p> <p>(b) Even if the tanks are discretionary as utilities, that the consent pathway is uncertain given:</p> <p>(i) The agreed capacity for utilities on Slope hill is limited, and only where that infrastructure "is buried or located such that they are screened from external view", which will not be possible here; and .</p> <p>(ii) Even as utilities, the tanks are urban development that is to be "avoided" outside the UGB.</p> <p>(c) Accordingly, if the UGB were extended to accommodate the tanks, then they would have clearer policy support in any application.</p>
Glenpanel Traffic/ Transportation matters				
45.	Location of the collector road		Jeff Brown	<p>Do you accept that the location of the collector road to the east of the TPLM Variation Area and in particular on the Glenpanel site:</p> <p>(a) has greater flexibility as to location than towards the west;</p> <p>(b) is not inappropriate in the location sought by Glenpanel; and</p> <p>(c) if consented in that location, and the properties to the east and west therefore had to connect to that</p>

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				location, there would be no major planning issue with that. Will the updated Structure plan as described in your para [41] achieve these outcomes?
46.	Nature of the collector road (including cross section)		Jeff Brown Colin Shields	Do you consider, in light of the agreed changes to the SH corridor (signalised intersections, reduced 60km/hour speed limit, and it being a Rapid Transport System, with Rapid Transit Stops), that it may be appropriate to reconsider what is most appropriate in respect of the nature of the collector road including its cross sections, and function?
47.	Effects of 180 dwellings	Colin Shields EIR, [42]-[45].	Colin Shields	Did you take instructions in rejecting at [44] Mr Bartlett's evidence that 180 units could be developed and occupied, without additional transportation infrastructure being in place? In any event, do you agree that: <ul style="list-style-type: none"> (a) the Flints Park Fast Track proposal was declined for policy reasons, principally that the site remained rural lifestyle and outside the UGB, given that the TPLM Variation had not been notified; (b) the evidence from Waka Kotahi NZTA was that 180 units could be developed and occupied; and (c) that you have no evidential basis to disregard what Waka Kotahi NZTA said at the time.

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48.	Consent pathway for occupation		Jeff Brown	<p>Do you agree that:</p> <p>(a) If an applicant can demonstrate that a certain number of units can be developed and occupied, without additional transportation infrastructure being in place, with minor effects only, then there should be a consent pathway available, ie that the objectives and policies should not in that scenario prevent delivery of houses to Queenstown when it is in a housing crisis; and</p> <p>(b) If you do not agree, then do you accept that despite the zoning (if approved) that it might in fact be many many years before housing is delivered to the market should key infrastructure triggers be delayed (eg until the westbound buslane is completed).</p> <p>In any event, how can compliance with the avoid policy be demonstrated:</p> <p>Avoid development where specific transport infrastructural works in Rules 49.5.10, 49.5.33, 49.5.50 and 49.5.56 have not been completed, unless it can be demonstrated that development will avoid future and cumulative adverse effects from additional traffic movements on State Highway 6.</p>

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				How can future and cumulative effects be avoided, or demonstrated to be avoided?
Heritage				
49.	Historical values of the Glenpanel Homestead		Robin Miller	<p>Do you agree that the Precinct and homestead need to be viewed in the wider context of other elements/features and their significance in terms of placemaking, being:</p> <ul style="list-style-type: none"> (a) The historic Shotover River bridge (b) The Ferry Hotel and other buildings on the lower eastern river embankment (c) Spence Road as the historic entry route (d) The water races across Slope Hill (e) The three gully networks on Slope Hill identified by geological and landscape experts? <p>And that:</p> <ul style="list-style-type: none"> (f) The Collector Road and route along the toe of Slope Hill need to add / expand / support integrating the wider heritage features.
50.	Adaptive use of the Glenpanel Homestead			<p>Do you agree:</p> <ul style="list-style-type: none"> (a) the value of the Homestead to the community (identity, heritage, placemaking, amenity) is too high to leave as residential; (b) but in order to enable the long term public use of the Homestead, it needs to be commercially viable and supported by surrounding uses of critical mass to ensure that it is protected, and appreciated, for the long term future.

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51.	Building heights in proximity to the Glenpanel Homestead	Robin Miller EIR 31	Robin Miller	<p>You consider that the proposed densities' and associated building heights have the potential to adversely effect the Glenpanel Homestead.</p> <p>Do you agree that:</p> <ul style="list-style-type: none"> a) The primary objectives are to: <ul style="list-style-type: none"> i. Preserve (as much as possible) the integrity of the key-elements – Homestead and surrounding grounds? ii. Establish the Precinct as a important 'heritage node' in terms placemaking and wayfinding? and b) If so, that enabling greater density and building height away from the key elements better would support the adaptive reuse of the Homestead – and thereby optimise heritage and public access outcomes? <p>Given the transport requirements for a midway (between the two signalised intersections) the Connector entry road from the SH and associated pedestrian crossing proposed by Glenpanel, do you also agree that:</p> <ul style="list-style-type: none"> a) This new link and its alignment provides an important direct physical (pedestrian-centric) and visual link to the Homestead and grounds, and; b) That this added amenity:

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				<ul style="list-style-type: none"> i. Effectively acts as an extension of the Homestead 'experience'?; and ii. Effectively alleviates many of his concerns with respect to building heights? c) Providing for graduated building heights north of the Collector Road through the building setbacks and heights proposed, is a better approach to maintain and optimise heritage values than the proposed current conditions provide for?