

**BEFORE AN INDEPENDENT HEARING PANEL  
APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER THE** Resource Management Act 1991

**IN THE MATTER** of a Variation to the proposed Queenstown Lakes District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991

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**STATEMENT OF EVIDENCE OF BRUCE CHARLES WEIR [URBAN DESIGN]  
ON BEHALF OF THE ANNA HUTCHINSON FAMILY TRUST**

**DATED: 20 OCTOBER 2023**

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## **MAY IT PLEASE THE HEARING PANEL**

1. My full name is Bruce Charles Weir. I am a Director of Saddleback Planning Ltd (**Saddleback**), and Principal Urban Designer.

### **Qualifications and experience**

2. I have been practising as an Urban Designer since 1991. I have been involved in, and led a wide range of urban design and urban planning projects throughout New Zealand, the South Pacific and China. The projects have ranged in both in scale and nature – from small urban developments, economic regeneration, masterplanned developments of scale as well strategic land use planning. Almost all projects have involved preparing reports, development guides, and as required, evidence which typically address matters of development rationale and impacts (positive and negative) proposed developments. My project lead role often involves balancing a wide range of competing interests and ensuring alignment with high-order objectives and policies from inception through to delivery. I have prepared and presented expert evidence at council hearings.
3. I hold a Bachelor of Planning degree and a Master of Urban Design (Hons) both from the from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute (*NZPI*).
4. I have also undertaken, and am undertaking, numerous projects within the Queenstown area, and the wider region over the last twenty years. These have included the Bullendale development at Arthurs Point under the Special Housing Act (SHA), The Koko Ridge Development in Ladies Mile, the Flints Park Masterplan applications as part of this Plan Change (for which I will also present expert evidence) and the Canyon Ridge development at Arthurs Point.
5. I am currently involved in Plan Change projects in Cromwell (PC14) and Hastings as well as Flints Park – Ladies Mile. I have advised the Anna Hutchinson Family Trust (**the Trust**) on this site since 2019 during which time I have made numerous site visits, provided expert advice for the Urban

Growth Boundary (**UGB**) submission and hearings, and engaged with Council.

6. I am familiar with the site, and surrounding environs. My last site visit was 8th May 2023.

#### **Code of Conduct**

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

#### **Scope of evidence/matters to be addressed**

8. While principles of good urban design have varied in title, intent and content over time, they have nevertheless proven robust in shaping quality urban outcomes. In New Zealand, the principles have been disseminated via the "7 Cs" of the Ministry for the Environment's *New Zealand Urban Design Protocol*<sup>1</sup>.
9. The 7 Cs of the *New Zealand Urban Design Protocol* provide the broad scope of matters to be considered in assessing urban design outcomes. Further guidance is taken from the framework of policy documents prepared under the RMA that prescribe the urban design outcomes anticipated in New Zealand's urban environments.
10. I have prepared evidence in relation to urban design considerations in support of the submission memorandum of the Trust, a submitter on the Te Pūtahi Ladies Mile Variation (**the Variation**). My evidence includes:
  - (a) Involvement in the Variation and the Trust's submission;

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<sup>1</sup> See <https://environment.govt.nz/assets/Publications/Files/urban-design-protocol-colour.pdf> in the Executive Summary at p4

- (b) Strategic guidance underpinning the Te Putahi Ladies Mile Masterplan (**the Masterplan**);
  - (c) Summary of principal issues;
  - (d) Identification of flaws in the Masterplan;
  - (e) Review of the appropriateness of the Extension Area sought by the Trust for inclusion in the Variation area.
  - (f) How to best include the Trust site in the Variation area.
  - (g) My conclusions and recommendations.
- 11.** An A3 Graphic Attachment (**GA**), dated 19 October 2023, is provided in support of my evidence.
- 12.** I consider the key matters in question or in dispute to be:
- (a) The application of walkable distances; and
  - (b) The capacity of the Variation area to deliver housing targets.

#### **Involvement in the Variation and Trust's submission**

- 13.** I have provided urban design and development advice to the Trust for this particular site, and have been the lead designer (Masterplanner) throughout. This work has included the testing of various development options, yield modelling and preparation of concept plans.
- 14.** My role in relation to the Trust's submission on the variation has been to provide advice and assessment in relation to urban design matters. In preparing this statement of evidence, in addition to working with and reviewing evidence from the Trust's experts, I have considered the following documents:
- (a) The TPLM Variation (and associated documents);
  - (b) The submission of the Trust on the TPLM Variation;
  - (c) The National Policy Statement on Urban Development 2020 (**NPS-UD**);
  - (d) The Queenstown Lakes Spatial Plan, July 2021 (**Spatial Plan**);
  - (e) Section 42A Report on the TPLM Variation prepared by Mr Jeff Brown, dated 29 September 2023;

- (f) Evidence of Mr Stuart Dun on the TPLM Variation – Urban Design, dated 29 September 2023;
- (g) Evidence of Ms Susan Michelle Fairgray on the TPLM Variation – Economics, dated 29 September 2023;
- (h) Evidence of Ms Jeannie Galavazi on the TPLM Variation – Open Space and Recreation, dated 29 September 2023;
- (i) Evidence of Mr Bruce Harland on the TPLM Variation – Urban Design, dated 29 September 2023;
- (j) Evidence of Mr Anthony Pickard on the TPLM Variation – Transport, dated 29 September 2023;
- (k) Evidence of Mr Colin Shields on the TPLM Variation – Transport, dated 29 September 2023;
- (l) Evidence of Mr Timothy James Heath on the TPLM Variation – Economics, dated 20 October 2023;
- (m) Evidence of Mr Don Mckenzie and Mr Jason Bartlett on the TPLM Variation – Transport, dated 20 October 2023;
- (n) Evidence of Mr Tony Douglas Milne on the TPLM Variation – Landscape, dated 20 October 2023; and
- (o) Evidence of Mr Phillip Mark Osbourne on the TPLM Variation – Economics, dated 20 October 2023.

### **Strategic Guidance**

- 15.** Urban development stakeholders (developers, Council and government agencies) are tasked, through the NPS-UD, to deliver "well-functioning urban environments". This, in simple terms, means balancing a range of competing interests to create lower-consumption, more-attractive environments for live-work-play.
  
- 16.** QLDC has established a response to this firstly through the Spatial Plan, which outlines how council will accommodate anticipated population growth over the next 30 years, and then secondly through targeted responses such as the Masterplan and Variation.

17. The Spatial Plan details a 'growth corridor' model and employs two key responses to deliver the higher order objectives, specifically:
- (a) Optimisation and enhanced utilisation of existing infrastructure
  - (b) Consolidation of residential density into key nodes along this corridor to support:
    - (i) Affordability and housing choice;
    - (ii) Modal shift; and
    - (iii) The implementation of a public transit<sup>2</sup> solution.
18. The Spatial Plan's Eastern Growth Corridor extends from the developing 5 Mile Metropolitan Centre to a proposed Local Centre along Ladies Mile. The 'backbone'<sup>3</sup> of this corridor is a 'turn up and go', high-frequency public transport service which connects mixed use centres and high-density residential development. As the plan below (albeit very high level) illustrates, the Extension Area is:
- (a) Fully within this growth corridor; and
  - (b) Centrally located between the 5 Mile Metropolitan Centre and the proposed TPLM Town Centre.
19. While the residential targets (2,100–2,400 dwellings) for the Variation area vary, what is abundantly clear is that housing demand consistently exceeds supply in Queenstown with housing shortages and affordability impacts compounding year on year<sup>4</sup>, and there is little doubt the Variation area would need to meet or exceed the current targets in a relatively short timeframe.

### Summary of Principal Issues

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<sup>2</sup> Public Transit being clearly differentiated from Public Transport (primarily buses) by virtue of (a) dedicated route provision (b) high capacity and (c) high-frequency services.

<sup>3</sup> See Pg. 60 of the Spatial Plan.

<sup>4</sup> I refer to the evidence of Philip Osborne and Julie Scott on this point

- 20.** Notwithstanding, the Variation, whilst substantially correct and robust, is at risk of repeating this same 'under-performance' in housing supply due to a number of flawed assumptions and errors in application including:
- (a) The extent of 'feasibly developable' land;
  - (b) Key site shaping attributes and movement systems, and;
  - (c) The realities of delivering high density residential housing within realistic timeframes.
- 21.** I note that the evidence of Colin Shields states that several submissions, including that of the Trust "consider that other locations should be prioritised for growth ahead of Ladies Mile." (para 69) This is not correct. The submission is that the Extension Area had been unjustifiably omitted from the Masterplan and Variation area, and is in fact a critical component in delivering the outcomes sought for TPLM given the shortfall in feasibly developable land within the Variation area. The evidence for the Trust also identifies that an unduly narrow and somewhat artificial approach on the Variation Area has been adopted by the Council, with the result that it has failed to identify the strategic nature of the Extension Area and the significant broader benefits that it can deliver not just to the Variation area but the wider Eastern Growth Corridor.
- 22.** Given the shortfall in the Variation's developable area, the potential impacts of this on successful movement systems and the commercial realities of delivering high density housing, the inclusion of the Extension Area would support the achievement of the housing provision target while remaining consistent with the vision of the NPS-UD and the Spatial Plan.

### **Flawed Assumptions of the Masterplan**

- 23.** I have identified several flawed assumptions within the Masterplanning process.

### Feasibly Developable Land within the Masterplan Area

- 24.** The masterplan area has been reduced from 160ha down to 120ha for the Variation over time. Although no specific reasons for this have been provided, they appear to include:
- (a) The area south of SH6 has already been developed or planned for development at low densities, specifically:
    - (i) The Queenstown Country Club retirement complex and hospital.
    - (ii) Land acquired by Council for a Park and Ride facility and regional sports grounds.
    - (iii) The large-lot Koko Ridge development.
  - (b) The Threepwood 'Future Urban' area, which for all practicable purposes, cannot be developed due to the complex legal tenure structure.
- 25.** Also significant is the likely diversion of developable land to school provision. It is well known that the Ministry of Education is seeking sites for both a High School (circa 6ha) and a 'Contributing' Primary School (circa 4ha). In addition to this at least 2 other private schools have, or are seeking to secure, land in TPLM. This means that around 20ha also needs to be removed from residential housing calculations.
- 26.** A shortfall in the area of land available for development risks compromising the delivery of a 'commercially-viable' public transit system (as sought in the Spatial Plan) along SH6 in the short-medium term. I note that the evidence of Mr Heath and Mr Osborne identifies concerns with both the Council's projections, and the narrow focus on the Variation area when looking at feasible development capacity.

#### Transit Nodes and Walkable Distances

- 27.** The significance of the Eastern Growth Corridor being underpinned and supported by Public Transit over time cannot be understated, and as a result the factors around modal shift and walkability need to be thoroughly addressed.

- 28.** Council officers and transport experts have made much of walkable distances however the application of them, in my opinion, has been confused and erroneous. This has been confirmed by the evidence provided by Mr McKenzie and Mr Bartlett with respect to transport consideration, and Mr Church with respect to integration with the overall Spatial Plan, it is worth reconfirming the salient factors impacting development outcomes at the western end of TPLM.
- 29.** The TPLM Transport Strategy<sup>5</sup> (**Transport Strategy**) underpins the Variation. Mr Colin Shields is the primary author of the Transport Strategy (para 4 of Mr Shields evidence) and confirmed by Anthony Pichard in his evidence (para 13). Therefore, it is important and useful to go back to first principles of the Transport Strategy to provide a robust foundation for assessment and review.
- 30.** The plans for the development of a Rapid Transit System (**RTS**) are detailed in the Transport Strategy (pg. 10) and include:
- (a) W2G public transport service frequency improvements 2024 and 2027 – specifically in relation to Masterplan:
    - (i) Service 5 clockwise loop at 10-minute intervals, and;
    - (ii) Service 2 at 10-minute intervals.
  - (b) Post 2027 roll out of W2G Bus Max network- double decker buses/articulated buses.
- 31.** This aligns with the service levels for such services in the ORC Public Transport Plan (**PTP**) (pg. 20).
- 32.** The NPS-UD defines RTS as high frequency (<15mins between buses) with rapid transit stops. Consequently, the guidance provided by the NPS-UD has direct relevance including:

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<sup>5</sup> V2 8.3.2022

- (a) Catchments for planned intensification around RTS routes and stops are defined as a walkable distance up to 1,200m (or a 15min walk)<sup>6</sup>; and
- (b) As a Tier 2 urban environment, Council must enable greater heights and density of urban form commensurate with the level of accessibility of existing or planned active travel (walking and cycling) networks or public transport (Policy 5).

**33.** This infrastructure investment strategy and programme, and consequential urban design considerations, are informed and reinforced by:

- (a) The Transport Strategy which details (pg. 20):
  - (i) From the Transport Stakeholders workshop on 2/12/20, that "bus users prefer to walk further for a higher quality of service", which the masterplan proposed routing provides;
  - (ii) Bus services will be concentrated on SH6 to provide a high frequency<sup>7</sup> and high quality of services;
  - (iii) These services are easily implemented during phasing of TPLM, since they utilise existing infrastructure and are not reliant on completion of phases of the Collector Road; and
  - (iv) That this approach is the most commercially viable option in the longer run.
- (b) The Queenstown Transport Business Case November 2020 which identified that the existing bus fleet along this route will be upgraded incrementally with a view to delivering highly efficient and environmentally friendly biarticulated "trackless tram" style vehicles as demand increases. A network of enhanced BRT station

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<sup>6</sup> Ministry for the Environment. 2020. Understanding and implementing intensification provisions for the National Policy Statement on Urban Development. Wellington: Ministry for the Environment.

<sup>7</sup> The Masterplan is based on 10min frequency.

stops will be provided with enhanced first mile/last mile connectivity. (pg. 27 of the Transport Strategy).

- 34.** Consequently, as a SH6-based rapid transit system is planned, the NPS-UD 1,200m walkable catchment from transit stops (or stations) should be the basis for all illustrations and comparative analysis in the Variation.
- 35.** The next consideration is the location of transit stops or stations (from which the walkable catchment should be applied). Although the key SH6 intersections already constructed or under-construction are roundabouts and proposed pedestrian crossings are underpasses, it is detailed in the Transport Strategy that Waka Kotahi / NZTA is looking to signalise these intersections over time<sup>8</sup>. This means they provide the safest crossing points for pedestrians and, therefore Transit stops or stations will be located in close proximity to these (typically on the outbound side of the intersection).
- 36.** This also means that:
- (a) The traffic design speed for the State Highway will likely drop<sup>9</sup>, and;
  - (b) The cross sections for SH6 provided within the Variation will need further consideration.
- 37.** While a range of other radii and walking models have been promoted by the Variation and Council team, in general terms:
- (a) Transit system stops/stations should be as far apart as possible to reduce stoppage times and improving speeds of the system, one of the key attributes which makes them attractive. The typical minimum distance between stops is  $\geq 800\text{m}$ .
  - (b) 800m is also the distance that people can comfortably walk in 10 minutes, and will therefore:

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<sup>8</sup> It is noted in the Transport Strategy that no residential units in sub areas A, B, H or I to be occupied prior to completion of at grade signalised pedestrian/cycle crossings across SH6 on the west side of the Stalker Road roundabout.

<sup>9</sup> SH6 speed limit to be reduced to 80km/h from existing 100km/h (east of Stalker Road) eastbound towards Arrow Junction by 2024 – and down to 50/60 km/h on SH6 between Howards Drive and Stalker Road once signalised intersections were provided.

- (i) Likely (i.e. >50% chance) elect to take a different mode over a private motor vehicle use, and;
  - (ii) Accept a medium density living environment.
- (c) 400m is the distance that people can comfortably walk in 5 minutes and will therefore:
- (i) Most likely (i.e. >70%) chose a different transport mode
  - (ii) Compromise on on-site parking; and
  - (iii) As a consequence, accept a higher density residential living environment.

**38.** All three measures generally align with the NZTA Ladies Mile Position Statement (received 8/10/20) that "The overall alternative mode share across the network will need to be in the order of 40% by 2028 to maintain a functional transport network". They go on to state that improving active and shared modes and influencing people's travel choices is fundamentally a function of shaping urban form. This reinforces the feedback from the Transport Stakeholders workshop (see paragraph 31(a)(i)) that commuters will walk further if both the transit system, and the routes to it, are of high quality.

**39.** It is pertinent to note that all walkable measures assume:

- (a) Relatively flat terrain;
- (b) Safe and legible streets and quality pathways (width, surface treatment);
- (c) Transit routes that connect desirable nodes (i.e. major shops, community or recreational facilities).

**40.** Therefore I disagree with Mr Shields broad statement (paragraph 70b) that 800m is not considered an easy walk to public transport. The walkable distance is in fact impacted by numerous factors.

- 41.** The application of a more nuanced approach, called 'ped sheds'<sup>10</sup>– more accurately reflects the walkable timeframes applied given terrain and other pertinent conditions. This approach enables better design and planning of built environment projects as well as addressing health and wellbeing outcomes for communities.
- 42.** This omission in not using this methodology is surprising given Council's own work<sup>11</sup> for PC10 and bus stop policies and standards<sup>12</sup> which seek a Ped Shed assessment.
- 43.** Consequently, had a ped-shed methodology been employed and not the radii ( 400m, 500m and 800m) variously applied by the Masterplan team, it would have been clear that:
- (a) A number of areas in the Masterplan should have been excluded, because they:
    - (i) Can't feasibly be developed,
    - (ii) Have already been developed.
  - (b) There are some significant issues to integrating the Shotover Country (SC) and Lake Hayes Estate (LHE) land to the south;
  - (c) The transit corridor was primarily supporting development to the north of SH6, and;
  - (d) Based on the guidance provided (up to 1,200m as detailed above) for a rapid transit service, the Masterplan had omitted to include a key land area which included the AHFT site.

#### Appropriate Development Land

- 44.** Notwithstanding the application of Ped-Sheds, for ease of comparative analysis, the appropriate walking radii have been applied to the Variation area and, in keeping with the growth corridor model, includes proximity to

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<sup>10</sup> Also known as 'walkscores'.

<sup>11</sup> IMPROVING THE AMENITY IN THE HIGH DENSITY ZONES, Technical Report on Urban Design, Tim Church / Boffa Miskell 2016.

<sup>12</sup> Adopted – Utilities 2 September 2006.

the Frankton Metropolitan area. The centre of each radii is based on the proposed upgraded signalised intersections.

- 45.** It appears that the inclusion of the Threepwood Farm to the east has influenced the Masterplan and Variation teams' thinking. However, for the reasons previously identified, this should have been excluded early in the process.
- 46.** More importantly, and as identified earlier in this statement, it is clear that the upper plateau immediately south of SH6 has already been developed, or is planned for development, at low residential densities or recreational facilities.
- 47.** Furthermore, there is a significant level difference from these developments down to the SC and LHE residential areas in the plateau below.
- 48.** These factors create a fairly 'inert' urban environment, which coupled with the topographical change, acts as a separator, not a link. This makes attractive and safe pedestrian linkages more challenging to deliver, which in-turn:
- (a) Reduces the functional ped-shed for the SC and LHE areas;
  - (b) Increases the significance of feeder bus services to support them; and
  - (c) As a result, means the primary focus for rapid transit provision in the Masterplan area is north of SH6.

#### Consequences for Masterplan Delivery

- 49.** While I generally agree with the structure of the Variation area, I believe it is not delivering optimal results in regard to housing provision and support of a modal shift towards public transport use. In my opinion the reduction in developable area cannot be offset by an increase in density thresholds.

- 50.** Placing an increased reliance on higher density residential development to offset this 'loss' of land risks impairing the short to medium term viability of residential development (I question the local appetite for high density housing and the capacity of the construction sector to deliver this housing). This point is also noted in the evidence of Mr Heath and Mr Osborne.
- 51.** The inherent issues and commercial risks with higher-density housing are reflected in the 'on the ground' situation where development of free-standing product on single titles is the preferred approach. As a result, a number of land owners in the TPLM Variation area are seeking lower density zonings and thresholds.
- 52.** I agree with economist Susan Fairgray where she states in her evidence " more intensive attached dwellings (apartments) are likely to become more established over the medium to long-term " and " The modelling indicates that most of the demand for apartments is projected to occur in the long-term (2031-2051) " (para 13).
- 53.** Notwithstanding the above, I agree that higher density areas are necessary, but there needs to be a housing provision solution in the near to medium term.

### **Appropriateness of the Extension Area for inclusion in the Variation area**

#### Proximity to Centres

- 54.** From the Extension Area the walk to a rapid transit service located around the SH6, Lower Shotover Road and Stalker Road intersection from Old School Road is about 1,200m /15min walk. With a sub-5 minute commute in either direction and assumed rapid transit stops within 5mins (400m) walk of the destination, commutes times are circa 25mins – well below the theoretical threshold to induce modal shift and support higher (medium) density urban environment.

- 55.** Active travel options are arguably more attractive with a walk to the 5 Mile Centre taking 40 minutes but just 12 minutes by bicycle<sup>13</sup> and slightly less to the proposed TPLM Local Centre.
- 56.** But this is only one consideration as to why the area to the west, and Extension Area in particular:
- (a) Should be included into the Variation area; and
  - (b) Considered a 'first cab off the rank' development opportunity.

Site Attributes and Anticipated Development Baseline

- 57.** Considerable emphasis has been placed on landscape character attributes of the Extension Area in regard to its omission from the Urban Growth Boundary (UGB) and Variation area. Yet there are several compelling factors which undermine this position and should have been acknowledged at the earliest stages of the masterplanning process. This has been addressed in more detail by Mr Milne in his evidence, however I will also outline the key parameters through an urban design lens.
- 58.** The site is located within a subzone (LCU7 – Domain River Terrace) of the *Wakatipu Basin Lifestyle Precinct* (part of the *Wakatipu Basin Amenity Zone*) in Chapter 24 of the Decisions Version (June 022) of the Proposed District Plan (PDP). The residential density standard for the subzone is a minimum net lot area of 4,000m<sup>2</sup> and an average density of 1 dwelling per 8,000m<sup>2</sup>. The pertinent landscape matters which relate to the focus area are:
- (a) The Landscape Character Units Assessment (Schedule 24.8) for the subzone which describes:
    - (i) "A limited sense of naturalness as a consequence of ...the proximity of the southern part of the unit to SH6", and;

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<sup>13</sup> According to google maps

(ii) The "Environmental characteristics and visual amenity values to be maintained and enhanced as a connection with riverscape and integration of buildings with plantings.

(b) The "Potential landscape opportunities and benefits associated with additional development:

(i) Larger-scaled lots<sup>14</sup> suggest potential for subdivision;

(ii) Close proximity to Queenstown;

(iii) 'Developed' context, and;

(iv) Easy topography.

**59.** Consequently, even though the entire subprecinct's "Capability to absorb additional development" was identified as Moderate-High, the Extension Area locale would be without doubt be at the upper range of this spectrum.

**60.** Given the site is, from a landscape perspective<sup>15</sup>, contiguous with the Te Putahi Ladies Mile area, it somewhat puzzling that the area has:

(a) Been rejected from inclusion into Urban Growth Limits,

(b) Excluded from the Masterplan Area and associated Variation.

**61.** Clearly Lower Shotover Road is not the defensible edge which Council and the masterplan team have sought in the west. The expert evidence for the Trust is clear that the appropriate edge is the Shotover River and associated publicly-owned curtilage.

**62.** Therefore, the only landscape 'edge' which needs definition is that between the focus area of the southern subprecinct and the balance north of that. This is most easily identified through both landform and notable landscape features identified in the PDP. Mr Milne's evidence, supported by Mr

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<sup>14</sup> Based on the areas current *Large Lot* zoning.

<sup>15</sup> Tony Milnes evidence

Church, identifies a very clear basis for a defensible edge to the north of the site. I agree with their evidence.

- 63.** Like the land immediately to the north, the Extension Area features an escarpment which effectively creates two almost flat plateaus within the site. The upper plateau is accessed off Lower Shotover Road, while the Lower plateau is accessed from Spence Road. It is separated from, and sits above, the existing settlement (including the historic Ferry Hotel) by another escarpment on the western boundary. These escarpments taper to the east<sup>16</sup> and effectively become moderate banks. The upper embankment extends through the Council 'Community Purposes' land (incorporating the Memorial Gardens / Lower Shotover Cemetery) to meet the upper section of Spence Road in the east.
- 64.** It should be noted that under the PDP, defined terraces require a 50m building setback. There are no defined terraces in the site and those identified in the sub precinct are well north of the site of Domain Road (refer Graphic Attachment to Landscape Assessment and Evidence of Mr Milne, dated 20 October 2023).
- 65.** Mr Milne has detailed in his evidence<sup>17</sup> that while there are low-moderate natural and ecological values for the site generally, reinforcing the qualities of the escarpments should be a core objective.
- 66.** As the 'Whakatipu Basin Lifestyle' development concept plan<sup>18</sup> (refer paragraph 66 for details) provided illustrates, a key factor impacting development of the site is a 75m building setback from any road boundary. This 'push's' built form toward the centre of the site.
- 67.** Lifestyle properties<sup>19</sup> in this location and with this level of amenity, will be highly sought after and, as a result, expensive. It is reasonable therefore to

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<sup>16</sup> Refer Image 7 –RMM Graphic Attachment, Tony Milne's evidence.

<sup>17</sup> Paragraphs 25–31.

<sup>18</sup> Plan 200 – RDA Masterplan, Saddleback

<sup>19</sup> Minimum net lot areas 4,000m<sup>2</sup> up to and over 1ha to achieve the 8,000m<sup>2</sup> average.

assume that, like the rest of Whakatipu Basin, dwellings on these lots will be of scale. Furthermore, an individual lot is allowed a residential flat within the maximum footplate, but ancillary buildings such as sheds sit outside of this again.

- 68.** As a result, the anticipated impacts of a 14 Lot lifestyle development will be substantially greater than 14 dwellings. As the concept plan illustrates, taking into account these parameters, development under the 'permitted<sup>20</sup>' zoning will result in visually more-intensive built form outcome compared to the existing environment, more akin to low-density urban development.
- 69.** This is, in my opinion, is an inefficient approach and poor outcome generally. Subdivision in the manner provided for is effectively urbanisation of a site like this. The creation of large lots with independent access fragments the land and restricts future through-site connectivity (pedestrian or vehicular). This severely constrains the ability for this site to deliver higher/better use outcomes in future. It is certainly not contributing to a "well-functioning urban environment".
- 70.** Consequently, based on this and of the parameters outlined previously which influence the development of the eastern Growth Corridor, the Extension Area is clearly more-urban in nature and should have been an integral part of the Variation.

#### **Incorporating the Extension Area into the UGB and Variation**

- 71.** Based on the intent detailed in the TPLM Transport Strategy to implement of Rapid Transit (RT) bus solution along SH6, all transport planners have agreed that Wakatipu Basin Lifestyle Area subprecinct focus area, and the Site in particular, are within desirable walkable extents.

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<sup>20</sup> A Restricted Discretionary Activity.

- 72.** Based on the evidence and guidance provided by Mr Bartlett and Mr McKenzie, the walking distances detailed previously<sup>21</sup> have been applied to a transit stop located immediately west of the Lower Shotover Road / Stalker Road intersection on SH6. The outcomes of this are clearly articulated in the conceptual Structure Plan<sup>22</sup>.
- 73.** I will defer to the respective evidence of Mr McKenzie, Bartlett and Church as to how this integrates with, and adds value to, the wider Variation from a movement perspective. From this it is clear is that almost all of the site is within a short (800m) walkable catchment and therefore suitable for urban (MDR-level) development.
- 74.** However, these general conditions need to be balanced with the landscape conditions and objectives provided by Mr Milne. This has resulted in the development of a conceptual 'urban' response which lowers the level of MDR and increases LDR to the north and north-western boundaries so as to create a softer transition to neighbouring properties. As a result the Extension Area Structure Plan details:
- (a) A simple land use pattern:
    - (i) 8.94ha proposed MDR zone
    - (ii) The balance 3.45ha proposed as LDR
  - (b) A Local Park<sup>23</sup>;
  - (c) A single main vehicle route to accommodate bus transport which services the entire site;
  - (d) An integrated off-road Active Travel network (pedestrian, cycle and e-mobility) which connects with existing trails networks:
    - (i) West-east from Spence Road (in close proximity to Old School Road) to Lower Shotover Road, incorporating the Local Park; and

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<sup>21</sup> Paragraphs 28–36

<sup>22</sup> Refer Urban Design GA - Plan 101: Spence Park Structure Plan

<sup>23</sup> Minimum 3,000m<sup>2</sup> and capable of containing a 30m x 30m shape as per QLDC Parks and Open Spaces Strategy 2021

- (ii) From the local Park southeast up to Spence Park and the transit hub.

- 75.** The plan also indicates possible extensions of the Variation area north of Lower Shotover Road, and across the Council 'Community Purpose' zoned parcel to the east (and potentially re-zoning this to MDR also).
- 76.** Senior Parks and Reserves Planner at QLDC, Jeannie Galavazi points out in her evidence, there is a shortage community buildings and facilities<sup>24</sup> in the TPLM Variation Area. There is currently "no community facilities other than a shared community hall at the Shotover Country School, which is usually at capacity with school bookings" (para 22) for the anticipated resident population of over 10,000 people (para 13).
- 77.** While the Glenpanel Flints Park proposal can also accommodate some of these amenities, this site will still play an important role in augmenting this, due to its site and location (in immediate proximity to a transit hub and the memorial gardens/ cemetery). The existing 'Community Purpose' zoning provides a reasonable degree of latitude in land use, and consequently may remain appropriate.
- 78.** As detailed in brief above, providing an increased area of Low Density Residential (LDR) on the northern and north-western boundaries reflects:
  - (a) Consideration of specific landscape and context attributes which impact that part of the site and help establish a landscape transition zone on the northern boundary;
  - (b) An appropriate interface with the historic Shotover precinct in the small plateau below the site, which forms part of the river corridor;
  - (c) The desire to preserve and utilise existing landform and features as much as possible; and

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<sup>24</sup> Paragraph 11 – " churches and other community buildings such as memorial halls, sports club rooms and scout dens that are available for the community to use."

(d) The desire to optimise frontage, and access to the Active Travel Corridors on both road frontages.

**79.** While more invasive earthworks and modifications to some land areas will be required, these are largely confined to the MDR-zoned area and limited in scale to preserve as much of the natural features (escarpment, feature boulder) as possible.

**80.** To support this the Extension Area proposes a reduction in typical density thresholds to help optimise the landscape-centric attributes which have been identified in the LUC7 and PA schedules. These are:

(a) LDR: 15–20dph

(b) MDR: 30-35 dph

Based on the respective areas (LDR = 3.45ha, MDR 8.94ha), the Site could deliver 320–380 dwellings.

**81.** Optimising the active travel network is particularly important to providing more intensive built form and reducing private motor vehicle reliance, which is possible because this Extension Area is located:

(a) Adjacent the River Trails network - providing wider off-road connectivity and recreational amenity;

(b) In immediate proximity (250m) to the Historic Shotover Bridge which links to other River Trails and bus services in Quail Rise (along Tucker Beach Road) approximately 800m walk away; and

(c) A short, relatively gentle walk ( $\leq 800\text{m}$ ) for the majority of the site to the RT Hub.

#### Delivering a Well-functioning Urban Environment

**82.** Intrinsic to delivering "well-functioning urban environment" are some basic design approaches:

(a) Minimising landform change, and leveraging natural attributes as much as possible;

- (b) Creating safe and legible routes as suited for the various transport modes, and;
- (c) Providing a range of residential types to support a 'complete' community.

**83.** A concept plan has been prepared demonstrating how development on the Extension Area could integrate into the wider Variation area. This concept has been prepared with due consideration given to transit networks and active travel connections and the landscaped features of the Extension Area and surrounding environment. This plan has been prepared with input from multiple urban design professionals, landscape architects and transport experts. The plan is not indicative of actual yield, but demonstrates how a well functioning urban environment can be delivered that contributes to the overall vision of the Variation area. While it is a raw iteration it nevertheless demonstrates that enabling more intensive development will result in far better outcomes than the large lot development that will otherwise occur.

**84.** I find it important to stress that this is a concept plan representative of possibilities. The actual form of development will be resolved at a later date after resolution of outstanding issues. What the plan does conclusively demonstrate is that the Trust site should be considered urban land.

**85.** The concept plan demonstrates that medium density can be achieved on the lower part of the Extension Area as:

- (a) Landscape features that form part of Local park on the lower plateau provides a focal point for active travel networks (legibility, wayfinding, placemaking); and
- (b) It is an appropriate place for increased density as it is high amenity (adjacent to open space) while having a low visual profile from State Highway 6 (development up to 13m enabled by medium density zoning will not be visually obtrusive given the backdrop provided by the escarpment).

**86.** Furthermore, the internal movement networks:

- (a) Would involve a simple internal road circuit (inherently low speed) with egress to Spence Road and River Trail network; and
- (b) Would be supported by an off road Active Travel work set into the escarpment landscape, which connects between Local Park with Rock Playground to Community facilities zone on the eastern boundary - mutual benefit.

**87.** In terms of landscaping, the removing of pine from Council and Trust land can be compensated for via restoration planting.

**88.** As detailed in paragraph 96 above, because the site is in immediate proximity to existing active travel networks, bus services in Quail Rise (via the Historic Shotover Bridge) and all utilities, it can be developed quickly.

#### Consequential Benefits

**89.** The development of the Extension Area (and others around it) will have other benefits other than enabling urgently needed and appropriate housing in the short-term. These are principally around reducing 'per household' demand on existing roading networks. The evidence of Mr Heath and Osborne also identifies this benefit.

**90.** Consequently, I agree with Mr Pickard that *"the transport impact of TPLM (with the proposed public transport measures) will be acceptable and will be managed such that the safe, effective and efficient operation of the transport network can be achieved"* (13) and that:

- (a) The worsening of congestion can be avoided;
- (b) Traffic effects from SC and LHE can be remedied in part; and
- (c) The potential levels of traffic generation can be mitigated.

**91.** Despite this, the inclusion of the Extension Area as part of the TPLM development would undoubtedly advance this quite markedly.

**92.** As detailed in the Transport Strategy:

- (a) Around 19% of vehicle movements over the Shotover Bridge are for school-related trips and contribute significantly to peak congestion. Without these trips the bridge operates well-within design capacity (3.9, pg 39).
- (b) A similar outcome is anticipated for the proposed Sports Hub which significantly lowers the volume of traffic currently navigating to the Queenstown Events Centre (QEC).

**93.** Consequently, accommodating and supporting the provision of schools within TPLM, particularly located along the ATN provides considerable beneficial impacts in terms of traffic movement and roading capacity for the wider network.

**94.** The concept of 'safe streets' is integral to a range of other urban design objectives. The rate of mode shift is directly correlated to the streetscape attributes and perception of safety. This is particularly important in locations like Queenstown with limited daylight hours and often-poor weather.

### **My conclusions**

**95.** While substantially correct and effective in delivering housing and encouraging modal shift, in its current iteration the masterplan area risks being 'undercooked' due to the progressive reduction in developable area and a reliance on high density housing to compensate. While I agree that high density housing is necessary, it is a long term solution in a market unused to higher density typologies and construction techniques.

**96.** Furthermore, due to a misapplication of walkable catchments around transit connections, I am concerned that there will not be sufficient commuters within catchment to support rapid transit services.

**97.** I consider that inclusion of the Trust's site within the masterplan area addresses the gaps in the current iteration and will achieve better overall

outcomes in terms of housing provision and modal shift towards public and active transport by:

- (a) Providing housing in the near term;
- (b) Supporting and connecting active transport networks, and;
- (c) Reducing the per household demand on the road network.

**DATED** this 20th day of October 2023



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Bruce Charles Weir

## APPENDICES

Attachment One – Graphic Attachment