

**BEFORE THE HEARING PANEL
AT QUEENSTOWN**

UNDER the Resource Management Act 1991 ("**RMA**")

IN THE MATTER of the Proposed Te Pūtahi Ladies Mile Plan Variation
to the Queenstown Lakes Proposed District Plan
("**Variation**")

**HEARING STATEMENT OF BEN FARRELL ON BEHALF OF
QUEENSTOWN COUNTRY CLUB VILLAGE LIMITED**

PLANNING

12 DECEMBER 2023

1. INTRODUCTION

1.1 My name is Ben Farrell. I am an independent planner based in Queenstown. I prepared planning evidence in chief ("**EiC**") on behalf of Queenstown Country Club Village Limited ("**QCC**"). I am familiar with the Ladies Mile context. My evidence is focused on the proposed Building Restriction Area ("**BRA**") affecting the QCC site. I consider a 75m BRA is not justifiable because the BRA:

- (a) prevents good urban development outcomes (namely high-quality retirement village housing); and
- (b) there is no higher-level policy direction to support a framework that prevents urban development on this part of the site.

1.2 QCC seeks further amendments to the Low Density Suburban Residential Zone ("**LDSRZ**") provisions relevant to the QCC Site. These amendments will allow appropriate urban development to occur at the QCC Site and are explained below.

2. CORRECTIONS TO EIC

2.1 A correction is required at paragraph 7.2 to my EiC. In the discussion of possible zoning options to the QCC Site, my reference to options (b) and (c) should instead read that I prefer option "(b)" (retain the LDSRZ with amendments to the provisions in Chapter 7) over option "(a)" (retain the LDSRZ without amendment to the provisions in Chapter 7).

3. DEVELOPMENTS AFTER EIC

3.1 Since preparing my EiC I have participated in the expert planners conferencing, reviewed Queenstown Lakes District Council's ("**QLDC**") rebuttal evidence, reviewed evidence from other submitters (both expert and from lay submitters), and have observed most of QLDCs presentations to the panel to date. Notably:

- (a) The speed limit along Te Pūtahi Ladies Mile is likely to be reduced and the Howards Drive intersection is likely to be a signalled intersection (not a roundabout as discussed in my evidence).
- (b) QLDC and experts now agree a 25m setback is appropriate. Some urban design experts support provision for development within this 25m setback.
- (c) QCC is not opposed to the proposed plan provisions recommended by Mr Brown for the QCC site.

4. UPDATED EVIDENCE

4.1 Reflecting on the above I consider:

- (a) The LDSRZ provisions should be amended to include a bespoke policy and rules / standards to enable retirement village housing on the QCC site. This should include the design and landscape outcomes sought by the relevant experts (where agreement is reached) and provisions allowing for development within the BRA provided standards are met; and
- (b) The BRA setback should be no more than 25m (potentially set at 20m) (subject to further consideration from Mr Brown and QLDC's landscape and urban designers). In my view it is appropriate for development within the BRA to have discretionary activity rather than non-complying activity status.

4.2 My updated recommendations to the LDSRZ provisions are attached to this summary.

New Policy

4.3 I agree with Mr Brown that a new policy relating specifically to the QCC site is appropriate to include in Chapter 7. This policy focuses on the landscape and urban design outcomes sought by the collective landscape and urban design evidence. This policy is based on the matters of discretion suggested by Mr Brown. Amendments to the exact wording of this policy may be appropriate, and I am willing to engage with QLDC to refine the text.

Rule 7.4.24

4.4 Mr Brown recommends Rule 7.4.24 apply to buildings beyond 75m from the QCC site boundary. There has not been any justification for this rule to apply beyond the 75m setback initially proposed by QLDC.

4.5 In my EIC I supported controlled activity status or restricted discretionary activity status, with a non-notification clause, for buildings outside the BRA but within 75m of the boundary of the highway. Mr Brown recommends restricted discretionary activity status. It is unclear from Mr Brown's reasoning why restricted discretionary activity status is preferable instead of controlled.

4.6 However, restricted discretionary activity status may be appropriate (for buildings outside the BRA and within 75m of the highway boundary), on the basis there is sufficient certainty in the amended provisions to provide for additional retirement housing on the QCC site. While the restricted discretionary status will result in increased consenting risks and costs compared to a controlled activity status, such increased risk and cost may be appropriate if additional housing is able to occur on the QCC site.

4.7 I suggest the following amendments to the matters of discretion set out in proposed Rule 7.4.24 to reduce ambiguity in the proposed provisions:

d. Design and integration of landscaping and fencing, ~~including existing vegetation~~;

e. Infrastructure, access and parking design; including the avoidance of parking areas ~~visible from~~ located between buildings and the highway;

- 4.8 In respect of the information requirements, I recommend deletion of reference to 'the approved development plan of SH160140'. This is because the approved development plan of SH160140 has been updated on numerous occasions via a number of separate resource consent application processes:

Information Requirements

a. Applications for resource consent shall contain a design statement describing how the proposed building location and appearance achieves the matters of discretion and is commensurate with existing buildings within the Queenstown Country Club and the approved development plan of SH160140.

Activity Status within the BRA

- 4.9 I do not support non-complying activity status for activities within the BRA which breach the relevant standards. I consider discretionary activity status is more appropriate. There is no reason for strongly discouraging proposals that breach the relevant development standards if the activity will contribute to an appropriate urban development. Non-complying activity status does not reflect the robust consideration and testing that the standards have been through in this Variation process, for example:

- (a) **Buildings within the BRA:** As discussed by Ms Rennie, buildings may be appropriate within the BRA, particularly around the SH6 / Howards Drive intersection.
- (b) **Maximum building height:** As discussed by Ms Rennie, buildings greater than 6m height may be appropriate.
- (c) **Density:** It may be appropriate for the number of additional units at the QCC site to exceed 21. Mr Brown's rationale for imposing this limit is unclear. The non-complying activity status strongly discourages higher density housing that could be appropriately located and designed within the QCC site. Discretionary activity status allows full consideration of relevant assessment matters which adequately enables consideration of the appropriateness of any proposal.

Ben Farrell
12 December 2023

Recommended Amendments to the LDSRZ

Insert new policy to Chapter 7 as follows:

[Provide for retirement village development at the Queenstown Country Club, including buildings within 75m from the state highway that address the surrounding context to contribute positively to the character of the area and the highway frontage, including building scale, form, density and separation between buildings to maintain a sense of spaciousness when viewed from the highway and to maintain views to the wider ONLs from the highway.](#)

Amend Rules & Standards as recommended by Mr Brown with the following changes:

Rules – Activities		
7.4.11	Retirement Villages Except this rule shall not apply to buildings that are Restricted Discretionary activities under Rule 7.4.24.	D
7.4.24	Queenstown Country Club (west of Howards Drive, Ladies Mile) 7.4.X.1 Buildings within 120m 75m of the boundary with the highway and outside the Building Restriction Area 7.4.X.2 Buildings within 20m of the Howards Drive Road Boundary Discretion is restricted to: <ul style="list-style-type: none"> a. Location, external appearance, site layout and design of buildings and how the development addresses its context to contribute positively to the character of the area and the highway frontage; b. Scale, form, density and separation between buildings to maintain a sense of spaciousness when viewed from the highway and to maintain views to the wider ONLs from the highway; c. The activation of the highway frontage and avoidance of the rear of buildings facing the highway; d. Design and integration of landscaping and fencing, including existing vegetation; e. Infrastructure, access and parking design; including the avoidance of parking areas visible from located between buildings and the highway; f. Stormwater management. Information requirements: <ul style="list-style-type: none"> a. Applications for resource consent shall contain a design statement describing how the proposed building location and appearance achieves the matters of discretion and is commensurate with existing buildings within the Queenstown Country Club and the approved development plan of SH160140. 	RD
7.4.X.2	Buildings within the Building Restriction Area within the Queenstown Country Club	D
7.5 Rules - Standards		
7.5X	Building Height (for flat sites) 7.5.1.1 Wānaka and Hāwea: Maximum of 7 metres. 7.5.1.2 Arrowtown: Maximum of 6.5 metres. 7.5.1.3 Kawarau Heights: Maximum of 4.5m and 6m as identified on the Structure Plan in 27.13.15. 7.5.1.45 All other locations except buildings within the Queenstown Country Club : Maximum of 8 metres. Queenstown Country Club 7.5.1.45 Within 120m 75m of the boundary with SH6: Maximum of 6m 7.5.1.6 Beyond 75m of the boundary with SH6: Maximum of 8m	NC D
7.5X	Density The maximum site density shall be: <ul style="list-style-type: none"> i. one residential unit or dwelling per 300m² net site area, or ii. one residential unit or dwelling per 800m² net site area at Lake Hāwea South within Area B as identified in the Structure Plan in 27.13.19. Except this rule does not apply to the Queenstown Country Club.	NC
7.5X	Maximum number of residential units 7.5.X.1 Queenstown Country Club within 120m 75m of the boundary of SH6 – A maximum of 42 units.	NC D
7.5X	Maximum Floor Area 7.5.X.1 Queenstown Country Club within 120m 75m setback from the boundary with the highway – individual buildings shall have a maximum floor area of 310m².	D