

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

UNDER the Resource Management Act 1991 (RMA)
IN THE MATTER of the Te Pūtahi Ladies Mile Plan Variation in accordance
with section 80B and 80C, and Part 5 of Schedule 1 of the
Resource Management Act 1991.

**JOINT STATEMENT OF URBAN DESIGN EXPERTS IN RELATION TO TE
PŪTAHI LADIES MILE PLAN VARIATION**

DATED 1 NOVEMBER 2023

Introduction

- 1 This joint witness statement (**JWS**) records the outcome of conferencing of urban design expert witnesses in relation to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**).
- 2 The expert witness conferencing was held on Wednesday 1st November 2023, at Queenstown Lakes District Council Chambers. Helen Atkins facilitated the conferencing remotely.
- 3 Attendees at the conference were:
 - (a) Bruce Harland.
 - (b) Michael Lowe.
 - (c) Stuart Dun.
 - (d) Bruce Weir.
 - (e) Tim Church.
 - (f) Dave Compton-Moen.
 - (g) Cameron Wallace.
 - (h) Jane Rennie (joined remotely up to 1pm).

Code of Conduct

- 4 This JWS is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
- 5 We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it.

Key information sources relied on

- 6 The following material has been reviewed by and/or relied upon by all attendees when coming to our opinions:
 - (a) The TPLM Variation (and associated documents);
 - (b) The evidence of Bruce Harland, dated 29 September 2023;
 - (c) The evidence of Stuart Dun, dated 29 September 2023;
 - (d) The evidence of Michael Lowe, dated 29 September 2023;
 - (e) The evidence of Bruce Weir, dated 20 October 2023;
 - (f) The evidence of Tim Church, dated 20 October 2023;
 - (g) The evidence of Dave Compton-Moen, dated 20 October 2023 for Koko Ridge, and 25 October 2023 for Flints Park noting this

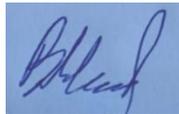
evidence had not been reviewed by the Council team prior to conferencing;

- (h) The evidence of Cameron Wallace, dated 20 October 2023;
- (i) The evidence of Jane Rennie, dated 20 October 2023;
- (j) The relevant parts of the Section 42A Report as it touches on urban design issues (**s42A Report**).

Purpose and scope of conferencing

- 7 The purpose of conferencing was to identify, discuss, and highlight points of agreement and disagreement in relation to urban design relevant to the TPLM Variation, and identify any technical drafting changes to the proposed District Plan provisions (and the reasons for those changes).
- 8 **Attachment A** records the agreed issues, areas of disagreement and the reasons, along with any reservations, and technical drafting changes to the proposed District Plan provisions (and the reasons for those changes). Note that Jane Rennie left at lunchtime so was not there for the discussion of the Glenpanel Homestead matter.

Dated: **1 November 2023**



Bruce Harland



Stuart Dun



Michael Lowe



Bruce Weir



Tim Church



Dave Compton-Moen



Cameron Wallace



Jane Rennie

ATTACHMENT A – EXPERT CONFERENCING ON URBAN DESIGN

Participants: Bruce Harland (BH), Stuart Dun (SD), Michael Lowe (ML), Bruce Weir (BW), Tim Church (TC), Dave Compton-Moen (DCM), Cam Wallace (CW), Jane Rennie (JR)

Issue	Agreed Position	Disagreements or reservations, with reasons
<p>General intent of the variation from urban design perspective</p>	<p>It was agreed that the variation is supported and informed by high level documents, including the NPS-UD and QLSP, noting that some of these were promulgated after the variation began its journey.</p> <p>The intent of the purpose, objectives and policies of the variation are broadly supported.</p> <p>Agreed the overall urban design related principles and that the conferencing needed to focus on their application. Constraints in the project need to be understood from the perspective of the urban design rationale provided.</p> <p>It was agreed to put scope and specific technical constraints raised by other discipline experts to one side for the purpose of conferencing on appropriate urban form and place-based outcomes necessary to create a well-rounded and liveable community.</p>	<p>Whilst this has been agreed, several experts have specific submission and evidence points on the provisions that contributes to the framework of good urban design.</p> <p>Experts for AHFT indicated that the objectives and policies can be equally applied to the Extension Area.</p> <p>The QLDC experts acknowledge ‘good urban design outcomes’ need to be considered in the context of ‘real world project’ constraints in this project (i.e. we have a maximum household ceiling, due to transport constraints).</p> <p>Experts for AHFT indicated some project constraints identified are understood to be reduced or resolved by other expert evidence and conferencing (i.e. reduction in speed limits along SH6).</p>

<p>The role of the Ladies Mile in terms of providing a gateway into Queenstown</p>	<p>It was agreed that the Ladies Mile, specifically the SH6 corridor, provides an important gateway experience – now and in the future - to Queenstown.</p> <p>It was agreed that:</p> <ul style="list-style-type: none"> ○ SH6 needs to be a key multi modal transport corridor with good amenity, and; ○ There is only limited opportunity for pedestrian linkage over SH6 between Ladies Mile and existing the Lower Shotover communities – and these warrant careful focus. <p>It was further agreed that the gateway will transition from a semi-rural gateway into an urban gateway along its length – and, that as an urban gateway that the focus is not about trying to hide buildings, but having these as part of the gateway.</p> <p>All agree at the least Northern development needs to front SH6 positively and should not turn its back to Ladies Mile.</p> <p>Reference to the Master Plan (page 28) was mentioned by JR. It was agreed that this diagram remains robust and is still relevant in terms of identifying the existing key site landscape transitional sequence features when</p>	<p>It is understood that the Landscape experts covered off this point but didn't necessarily reach an agreement.</p> <p>The appropriate length and design of the gateway corridor (ie cross section) was also discussed but this was not agreed (i.e. consistent setback condition vs fluctuating condition).</p> <p>Experts raised a number of specific issues that are relevant to the role that Ladies Mile plays as a gateway:</p> <ul style="list-style-type: none"> - The Council (BH) noted that they don't see the area in the future as being a hard urban gateway edge condition like you would expect in large urbanised cities But one that ensures the SH6 corridor would integrate existing special placemaking qualities and the unique landscape environment (including openness and views to key landscapes, particularly on the south side of SH6) with urban attributes expected of a multi-modal urban corridor. - Council (BH) note that Council's plan change has to consider and balance a wide range of issues and public feedback largely in opposition to the plan variation including the concern with
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	<p>moving along SH6. Council noted that it does not show land ownership. Council further noted that pages 52 and 53 of the Master Plan which show directed views to Slope Hill and wider views of the Remarkables are important to consider for the future form of the gateway in relation to sense of place. Retaining wider views to the Remarkables to the south were identified by Council as the higher priority along the corridor.</p> <p>It was agreed there is potential to support the urban form outcomes of the town centre and community facilities with appropriate civic or urban development around the Howards Drive intersection.</p>	<p>the eventual loss of rural landscape character. It was noted by Bruce H that the current proposed 25m Northern setback has already been reduced from 75m in previous concepts plans.</p> <ul style="list-style-type: none"> - AHFT experts (TC) indicated that the main section of urban gateway along SH6 in question is between Howards Drive and Stalker Rd intersections, given the extensive open space provision at 516 Ladies Mile to the south and Threepwood properties to the north. DCM questioned whether a 25-75m setback were the best urban design solution when designing a 'new town' and acknowledging new information provided by Transport experts. - CW noted that the Queenstown Spatial Plan currently indicates further eastward urbanisation in the future (to Alec Robbins Road) which would reduce the importance of TPLMs role as a "gateway" into Queenstown. This is a relevant contextual factor that should influence any the extent of any gateway treatments in light of Council's aspirations around housing numbers.
Walkability assumption	There is no agreement on the walkability assumptions in the variation with some experts taking the view that a more nuanced approach is required.	There was no agreement over the nature and implementation timeframes of the planned Rapid Public Transit (RPT) and associated stops, and therefore

	<p>It was agreed that the changes proposed to SH6 whereby there will be two pedestrian crossing points at Howards Drive and Stalker Road will:</p> <ul style="list-style-type: none"> ○ Place higher importance on these intersections, and; ○ Result in SH6 being more pedestrian and cycling orientated. <p>It was also agreed that these two nodes/crossing are not consistently treated. In that it is more urban (and more detailed) at Howard Drive than the western end.</p> <p>It was agreed that some limited higher density residential development with a small commercial component (e.g. café) around a future PT node at the Stalker Road intersection would not be a poor outcome.</p>	<p>appropriate walkable distances. BH referred to 'bus stops' whereas the AHFT experts referred to rapid transit stops in alignment with the Transport Strategy.</p> <p>TC suggested the use of the NPS-UD guidance and more nuanced Waka Kotahi walkability thresholds of 400m, 800m and 1200m where TOD / urban form relationships could be more targeted. The variation seems to rely on a flat 1km threshold.</p> <p>BH contended that the NPS UD refers to rapid transit stops in relation to dedicated bus and rail systems and considers this is more appropriate to major centres like Auckland issue rather than here. As a consequence, BH considers that:</p> <ul style="list-style-type: none"> - 400m-800m is more appropriate, and - most of the masterplan area is encapsulated with 800m with only a small area beyond that. <p>AHFT experts (TC) noted that:</p> <ul style="list-style-type: none"> - There are parts of the Variation area that remain outside a 800m walkable catchment from the town centre, but within those of the planned western rapid public transit stop. - A1200m walkable catchment should be applied to Te Kirikiri Frankton Metropolitan Centre and;
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		<ul style="list-style-type: none">- The plan variation needs to consider the possibility that rapid transit along SH6 could happen sooner than anticipated (medium term). <p>Council (ML and SD) note that they intentionally created 1 main commercial centre and aligned the majority of the proposed Medium and High Density Residential precincts within a 10 minute walk (800m) catchment to optimise convenient access for these residents.</p> <p>The AHFT experts noted that this safe and convenient access was not necessarily so for those from Shotover Country and Lakes Hayes Estate within 800m.</p> <p>Regarding the need for a second node/hub near the Stalker Rd / Lower Shotover Rd intersection, ATFT experts noted that:</p> <ul style="list-style-type: none">- (BW) This is only one of the two safe pedestrian crossing points and will therefore have elevated urban significance, and;- (TC) The western RPT stop is potentially a lost opportunity to establish a TOD node and implement good urban form around this before lower density development likely impedes this for the next 50+ years.
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		<p>Council (BH) also noted that the population cap is the constraint here and that Council do not have a blank slate. The population cap was driven by the transport (private motor vehicles) limitations imposed by the Shotover Bridge. The population cap is not an urban design derived consideration.</p>
<p>Queenstown Country Club submission seeking to remove BRA across northern portion of its land (reduce 75m to 25m)</p>	<p>The length and depth of setbacks were not agreed by the experts.</p> <p>BH noted that with regards to the northern side there is agreement that, in principle whatever happens in terms of development the development should front face the corridor from an urban design perspective. This was generally agreed.</p>	<p>JR commented and asked the question as to whether there was agreement that there needs to be high amenity corridor.</p> <p>TC noted that there are other urban design outcomes that need to be considered alongside establishing a gateway, including: effective use of developable land within walkable catchments; severance between established and proposed communities; and supporting appropriate design speeds along SH6. The gateway concept is currently prioritised over these. DCM agreed with this comment.</p> <p>Several of the submitter's experts queried if there were other ways of achieving the Council's desired outcome of the setbacks (in terms of urban design, arrival, gateway, and sense of place with views to the surrounding landscapes) without simply applying a</p>

		<p>blanket setback (e.g. Te Kirikiri Frankton Masterplan approaches).</p> <p>The Council confirmed that it had not heard anything that has changed its position on setbacks. However, Council is open to some changes with regards to the setbacks in relation to the Howards Drive intersection and that it warrants more nuanced treatment. Council (ML) did note that low density development on the QCC land adjacent to the Howards Drive intersection would not likely be worth prioritising over the loss of other urban design amenity values (e.g. sense of place, openness, and rural amenity values gained from the 75m setback). This will be considered in more detail in their rebuttal.</p> <p>No agreement was reached regarding treating the Stalker Rd / Lower Shotover Rd intersection consistently and this may depend on the outcome of the second western node.</p>
<p>Contextual analysis undertaken and role of larger centre and smaller neighbourhood centres, including also</p>		<p>TC asked the question of Council as to:</p> <ol style="list-style-type: none"> 1. Did they consider the relationship of the variation with the with Frankton Master Plan?; and

<p>Te Kirikiri Frankton Masterplan, health hub Kawarau Park.</p> <p>And as a result of the above the need for a second neighbourhood centre located towards the Western end of the site (Stalker Rd).</p>		<p>2. Did they consider the issue of hierarchy of centres?</p> <p>Council (BH) confirmed that the Te Kirikiri Frankton Master Plan was considered in the design process, and that the hierarchy between Frankton and TPLM is fundamentally important – <i>Te Kirikiri Frankton is the key commercial centre servicing the wider Queenstown area and eastern corridor.</i></p> <p>Council acknowledged Te Pūtahi Ladies Mile has been designed to be complementary and not to compete with Te Kirikiri Frankton, in terms of its size and activities enabled in the plan provisions, to service the local needs of TPLM and the surroundings.</p> <p>BW noted the evidence of Jeannie Galavazi (for Council) which points to a serious shortage of community facilities and amenities for the existing and proposed population.</p> <p>Experts disagreed if a second local hub should be more formally planned for near Stalker Rd. Council understood the theory and outcomes sought, however, were undecided on the day given the realities of the site's dwelling cap constraint meant any increases in</p>
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		<p>density has to be reallocated from elsewhere in the site from areas generally in closer proximity to the main LM commercial centre. Council weren't convinced diluting density around the main centre was a good outcome.</p> <p>TC noted the neighbourhood centre recommended was not intended to compromise the vibrancy of the main commercial precinct, but play a part of the centre hierarchy (as anticipated in the PDP). While it was acknowledged there is provision in the variation for small scale commercial developments within residential areas, these would not be a proactively 'planned' response associated with the RPT stop.</p>
<p>Density</p> <ul style="list-style-type: none"> a. A minimum density provision applied to the TMPL variation b. Exclusions under rule 49.5.16.2 in relation to public roads 	<p>In principle it was agreed that a minimum density threshold is needed as there is a risk that TPLM could be underdeveloped without it, which would not be a good urban design outcome. However, there was no agreement as to what the number should be.</p> <p>There was no agreement between the experts in relation to the density provisions.</p>	<p>The submitters' experts consider that minimum density provisions are not the only driver with regards to delivery on the population targets and could also be balanced with density increases in other areas (e.g. around second node) and / or inclusion of additional urban development land (e.g. AHFT submission on the Extension Area).</p> <p>The issue of the exclusion of the areas for public roads and what the overall developable area was discussed.</p> <p>CW and BW and DCM had concerns that:</p>

<p>c. Developable area</p>		<ul style="list-style-type: none"> - The provision of HDR is somewhat contingent on the provision of high-quality urban amenity (RPT, commercial and schools) and spaces; - HDR is most costly to deliver and has limited market appeal (typically 5–10%) of a masterplanned development, and consequently; - The current extent of HDR and density minimums could lead to unintended and adverse consequences – specifically unfeasible development sites, remaining vacant in the short-term, limiting housing availability. <p>BW also noted that the provision of community amenities and facilities would further reduce the quantum of residential land. Simply raising the required density thresholds to offset would exacerbate concerns raised.</p> <p>CW and Council agreed that there is a risk that developers might intentionally avoid creating public streets (due to the efficiency gains of using private roads which can be narrower). Urban design preference is for a greater reliance on public roads.</p> <p>CW noted that there is uncertainty around the ultimate extent of residential land available for development with</p>
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		<p>both the minimum and maximum densities informed by assumptions around the size of schools and parks (which are yet to be confirmed by MoE). If these are smaller or larger than anticipated there could be practical issues with consentability of development due to the risk of triggering a non-complying activity status.</p> <p>TC noted that ideally definitions on how density is calculated should be treated consistently across the district or nationally, rather than having a specific approach such as in this case. However, Council experts noted that this doesn't currently exist.</p> <p>DCM noted that care needs to be taken with regards to setting these targets as the whole purpose of the variation is to have development, not stymie it.</p> <p>The issue is how to deliver density through different outcomes but the difficulty is how we do that in absence of minimum density provisions.</p> <p>Council (ML) noted that the minimum density is set at the population threshold level which is set to unlock key walkable neighbourhood amenity provisions such as the requirements with regard to the provision of</p>
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		<p>community facilities, parks, commercial centre viability, and those relating to public transport.</p> <p>BW noted that transport experts had indicated that a density of 40dph was the minimum threshold to support RPT.</p> <p>Council experts noted there is might be an option (e.g. planning mechanism) to allow for the staging of density such that the highest density (e.g. 6 storey buildings) can be pushed out to later stages of the development, yet provide some certainty that the overall density will still be achieved.</p> <p>BW contended that:</p> <ul style="list-style-type: none"> - A higher level of MDR would still achieve that outcome, and; - Incentivising higher density product through amenity provision (demonstrated in the Glenpanel Homestead Precinct) would be a better approach.
<p>Development standards</p> <p>a. Increased yield through</p>	<p>The submitter (CW) noted that this submission point is inter-related to density and if that is resolved then this issue resolves also.</p>	<p>BW questioned (and agreed with by DCM) why 'freestanding dwellings' were omitted as a typology option (ie non-compliant activity) in MDR standards when:</p>

<p>terraced typology</p> <p>b. Other standards in Ladies Mile Property Syndicate evidence</p>		<ul style="list-style-type: none"> - Compact zero-lot typologies had market acceptance in the district, and; - Typologies which rely on inter-tenancy (IT) walls and floors are inherently more expensive to deliver. <p>No consensus was reached on this issue.</p>
<p>Glenpanel Homestead submission and evidence, including:</p> <ul style="list-style-type: none"> a. Higher intensity mixed use quarter b. Building height sought of 17m in Glenpanel precinct c. Urban design implications of extension of UGB up to where water reservoirs are d. Transition zone along toe of Slope Hill 	<p>There was no agreement reached on the submission and evidence in relation to Glenpanel.</p>	<p>There was a general discussion led by BW and DCM regarding the position of the submitters including feedback from the Council. Key issues raised were:</p> <ul style="list-style-type: none"> - The Homestead Precinct plays an important role in wayfinding and placemaking for the masterplan area. - The Glenpanel Homestead has a resource consent for adaptive re-use (to a function centre) and an NZTA-approved access road from SH6 - Proposed additional built form is sought away from the Homestead with the inclusion of development setbacks to strengthen the commercial viability of retaining and enhancing the heritage and landscape elements of the precinct. The setback would likely lead to greater protection of existing specimen trees by the Homestead as well as giving the heritage building 'breathing' space.

		<ul style="list-style-type: none">- The position of the ONF in this location is still being debated by landscape experts.- Development along the toe of the Hill as proposed will have little physical and visual impact but will help support community and commercial objectives. <p>It was acknowledged by all that as the only submitter seeking to provide a resolution (adjustment to the UGB) for the water reservoirs, implementation of the masterplan area was largely contingent on resolution of this matter.</p> <p>Council confirmed that their position will be addressed in their rebuttal, but they hadn't time to consider what their position was at this point. However, they support the principle of providing more certainty and design direction as to how the heritage building and landscape grounds could be more proactively planned to get good urban design outcomes in terms of how heritage is set among the surrounding new development (as shown in the submitters most recent expert evidence proposal, DCM dated 25 October 2023).</p>
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<p>Anna Hutchison Family Trust submission, including:</p> <ul style="list-style-type: none"> a. Appropriateness of rezoning from urban design perspective b. Proximity to, and ability for active travel links c. Defensibility of Lower Shotover Road as edge (compared to northern side of submission site) d. Subdivision under permitted rules effectively urbanisation of the submitter's site 	<p>It was agreed that this issue is broader than the Anna Hutchison Family Trust submission and there was a general conversation about the rationale for boundary specifically in relation to the western area and the ONF further east.</p> <p>No agreement was reached regarding what the boundary should be.</p> <p>All agreed it would be a lost opportunity if the land within the Extension Area submitted on by AHFT was built on as low density or lifestyle block, as without the current infrastructure constraints, this site may be appropriate for urban development.</p>	<p>The Council experts advised that nothing has changed for them which convinces them to include the Trust land into the variation for urban development within the short to medium term of the PDP.</p> <p>BW and TC noted that the Extension Area might be useful in the short-term staging of the corridor, given proximity to existing services, and proximity to Te Kirikiri Frankton (within 15-minute active travel catchment) where residents may be less dependent on vehicle crossings over bridge and development of the TPLM commercial activities.</p> <p>Council (BH) noted that from an urban design perspective they want to see the best urban outcome without the consideration of the population cap constraints that currently apply. These outcomes include quality walkable environment and good public transport. He noted that if there was a clean slate with no transport / density cap and took a long-term view (which includes accepting that Te Kirikiri Frankton is Metropolitan Centre, with an employment hub and community infrastructure, and that Te Pūtahi Ladies Mile is part of a connected corridor) then consideration of the inclusion of the Trust's land could be on the table.</p>
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		<p>Submitters noted that the site is at a critical point along the Active Travel Network and that incorporating the site would support overall network resilience (reducing reliance on Spence Road which is subject to a SH6 road widening overlay)</p> <p>It was also acknowledged that the Memorial Gardens are an urban amenity and occupy only part of a bigger community facility 'precinct' adjoining the site – and the potential this represented.</p> <p>There was discussion of such tools as future urban zone, which is not something that QLDC use in its plan, or including the Extension Area within the UGB and that these are something that could be considered.</p> <p>DCM noted that previous versions of plans for Ladies Mile (under the HAASHA) had different boundaries which changed often, due to political reasons or cadastral boundaries rather than for urban design or urban form reasons.</p> <p>There was discussion that the sites landscapes attributes are not development constraints (i.e. the level difference between upper and lower terraces is the same as that of Shotover Country and Lake Hayes</p>
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		<p>Estate) but could influence how land uses and density might be employed on the site.</p> <p>The Council will consider including such matters in its rebuttal.</p>
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<p>Note that no drafting changes have been proposed to the District Plan provisions (9.11(e) Hearing Panel Minute)</p>	
<p>Change proposed</p>	<p>Technical Reasons</p>
<p>NA</p>	<p>NA</p>