

**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.

**STATEMENT OF REBUTTAL EVIDENCE OF ROLAND BRUCE HARLAND
10 November 2023**

PO Box 323 QUEENSTOWN 9348
Tel +64 3 379 7622
Fax +64 3 379 2467

WYNN WILLIAMS

Solicitors: L F de Latour / K H Woods
(lucy.delatour@wynnwilliams.co.nz /
kate.woods@wynnwilliams.co.nz)

Introduction

- 1 My full name is Roland Bruce Harland. I am an Urban Designer and Design & Development Lead at Candor3.
- 2 I prepared a statement of evidence on behalf of Queenstown Lakes District Council (**QLDC** or **Council**) dated 29 September 2023 on the submissions and further submissions to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**). My evidence considered the role of masterplanning, the site description and context, the background and rationale for the masterplan process, and a high level summary of the Te Pūtahi Ladies Mile Masterplan (**TPLM Masterplan**).
- 3 I have the qualifications and experience as set out at paragraphs 9 and 10 of my statement of evidence dated 29 September 2023.
- 4 I repeat the confirmation given in my evidence that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

Scope of rebuttal evidence

- 5 In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters as that evidence relates to my evidence. I also attended the urban design expert conferencing session on 1 November 2023 and have also read and considered the Joint Witness Statement produced at that expert conferencing session.
- 6 In this evidence I respond to the:
 - (a) Statement of Evidence of Tim Church on behalf of the Anna Hutchinson Family Trust (107) dated 20 October 2023.
 - (b) Statement of Evidence of Bruce Weir on behalf of the Anna Hutchinson Family Trust (107) dated 20 October 2023.
 - (c) The experts' joint witness statement on urban design, dated 1 November 2023.
- 7 In particular the key issues which my rebuttal evidence focusses on is grouped around the following topics:
 - (a) Alignment with the Te Kirikiri Frankton Masterplan;

- (b) Western Extent - Rationale for Boundary in Masterplan and Notified Variation;
 - (c) Walkability Assumptions; and
 - (d) Layout of a Proposed Western Node.
- 8 The fact that this rebuttal statement does not respond to every matter raised in the evidence of submitter witnesses within my area of expertise should not be taken as acceptance of the matters raised. Rather, I rely on my Evidence in Chief and this rebuttal statement to set out my opinion on what I consider to be the strategic Urban Design matters that shaped the TPLM Masterplan and the TPLM Variation.

Alignment with the Te Kirikiri Frankton Masterplan

- 9 Mr Church's evidence, on behalf of the Anna Hutchison Family Trust, raised questions about the lack of regard to the Te Kirikiri Frankton Masterplan and the considerable future development of this area including the intensive business Mixed Use zone and the implications on the TPLM Masterplan.¹
- 10 In responding to this matter, I can confirm that the Ladies Mile Consortium (LMC) design team had familiarised themselves with the Te Kirikiri Frankton Masterplan as part of understanding the context of Ladies Mile and where it sits in the wider spatial context and hierarchy of centres, employment and development that were proposed as part of the Proposed District Plan and the emerging Queenstown Spatial Plan.
- 11 Although the reference to the wider Frankton area (including the Airport and Remarkables Park may have been relatively brief in the TPLM Masterplan and in my Evidence in Chief (paragraph 46), the LMC team were well aware of the significant employment, services and higher order retail activities located in this area. This was reflected in the original RCG Report which acknowledge and took into account a consented but undeveloped neighbourhood centre in Shotover Country, the existing Kawarau Park centre, Arrowtown Town Centre, Arrowtown Local Shopping Centre Zone and the role of the higher-order centres in Frankton and central Queenstown. Furthermore, the limitations on large

¹ Statement of evidence of Tim Church dated 20 October 2023, for example at paragraphs 21, 26.

format retail being limited to a single supermarket site and limitations on office sizes in the TPLM Variation are an acknowledgment of the hierarchy of the local centre function of the proposed Ladies Mile Commercial precinct vis a vis the Frankton Masterplan and wider spatial understanding.

- 12 In my view, the TPLM Masterplan contextual analysis and in particular the design response does take into account the wider understanding of the existing and proposed centres including the local context of Shotover Country and Lake Hayes Estate Communities and how Ladies Mile fits into the wider Queenstown Whakatipu area, including the proposed public transport corridors that directly link Ladies Mile to Frankton (a metropolitan centre), Queenstown and the southern corridor.

Western End – Rationale for boundary in Masterplan and Notified Variation

- 13 The TPLM Masterplan and notified TPLM Variation proposed the western boundary at Lower Shotover Road. The apparent lack of a rationale for this boundary has been questioned by Mr Church at paragraph 22 of his evidence. The rationale for this boundary in the TPLM Variation is based on a number of factors including:
- (a) Establishing a community and commercial ‘heart’ for both existing and new residents. This is focussed around the Howards Drive area which includes the town centre, a proposed High School (which was illustratively shown in the TPLM Masterplan only), Council’s 516 sports park and the community park. This is clearly illustrated on pages 46 to 47 of the TPLM Masterplan document. This central heart will become a major centre of gravity for the developing area and is within 1200m or a 15 minute walk (or easy flat cycle) for all residents on the northern side of the SH6. This central hub will play a key role in supporting the higher density development in the surround HDR precinct and having a strong centre is a crucial element to achieving the objectives of the TPLM zone.
 - (b) Requiring higher densities (through the MDR and HDR Precincts) to support the public transport mode shift and the non residential activities proposed, while acknowledging that there is an overall agreed dwelling cap of 2400 that can be supported by the

transport modelling. In essence the TPLM Masterplan proposes a step change to enable an urban form that moves towards a focus on creating a quality liveable environment with easy walking and cycle access to a strong and vibrant centre that includes a wide range of services and community facilities, while also providing excellent public transport connectivity to the wider Queenstown area including the Frankton metropolitan centre, Queenstown, Arrowtown and the southern corridor.

- (c) Defensible Boundary – The existing Lower Shotover Road, toe of Slope Hill and the Cemetery provide a defensible boundary for the western boundary as discussed in Mr Skelton’s evidence in chief dated 29 September 2023. In paragraph 98 he states that “*I consider that the TPLM Variation Area as notified is well contained to the west and northwest by a distinct biophysical feature (Slope Hill’s southwest ridge to where it meets the Shotover River escarpment) which is reenforced by land uses (the cemetery) and roads (Lower Shotover Road and SH6 cutting).*” It is noted that in the Landscape JWS that the experts agreed “*that the extent of the structure plan (TPLM variation area) is appropriate*”,² although the experts disagreed as to whether the Variation area could extend further west. Mr Skelton has further addressed this issue in his rebuttal evidence (refer paragraphs 21-22 of his evidence) where he confirms his original assessment.
- (d) Integrated SW Management – The land west of Lower Shotover Road is in a different catchment and would not be part of an integrated solution for the northern side of SH6. It is noted that all Infrastructure experts agreed in their JWS that Anna Hutchinson Family Trust Land west of Shotover Road is in a different stormwater catchment area.³

- 14 In my opinion, taking into account these key factors, the proposed western boundary as notified does have a clear rationale.

² Landscape JWS dated 2 November 2023, at paragraph 2(b).

³ Stormwater and Infrastructure JWS dated 2 November 2023, at paragraph 5.

Walkability Assumptions (Masterplan Does not align with Walkable Catchment Theory) and the western Node

- 15 Walkability assumptions were discussed in the Urban Design JWS, where there was no agreement on the walkability assumptions in the variation with some experts taking the view that a more nuanced approach is required.⁴
- 16 Both Mr Church and Mr Weir on behalf of the Anna Hutchison Family Trust raise questions around the approach to applying walkable catchments. Bruce Weir at paragraph 34 of his evidence considers that as SH6 is a planned transit system that under the National Policy Statement for Urban Development (**NPS-UD**) a 1200m walkable catchment from transit stops should be the basis for a comparative analysis of the Variation. This approach was reiterated by Mr Church in the Urban Design JWS where he noted that there are parts of the Variation that remain outside a 800 metre walkable catchment from the town centre.
- 17 One of the points of discussion on walkability assumptions in the Urban Design JWS revolved around the NPS-UD how the application of a rapid transit service may influence the extent of walkable catchments to a rapid transit stop (as defined under the NPS UD). In the Urban Design JWS no agreement was reached on the walkability assumptions in the TPLM Variation and there was no agreement over the nature and implementation timeframes of the planned Rapid Public Transit (RPT) and associated stops, and therefore appropriate walking distances. Since that conversation the Planning JWS has reached a general agreement that the LM corridor will be a Rapid Transit Service (**RTS**) under the NPS-UD, with some concerns around scale and capacity.⁵ As Queenstown is a Tier 2 local authority the compulsory requirements to enable 6 storey buildings within a walkable catchment of a rapid transit stop do not apply.
- 18 Policy 5 of the NPS-UD requires that as a tier 2 local authority Council must enable heights and density of urban form commensurate with the greater of:

⁴ Urban Design JWS dated 1 November 2023, pages 3-6.

⁵ Planning JWS dated 1 November 2023, at page 1.

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
 - (b) relative demand for housing and business use in that location.
- 19 In my view in applying policy 5 of the NPS UD to the Ladies Mile context requires a wide range of factors to be considered that reflect the local context and acknowledge that different locations with different characteristics will have different sized walkable catchments. It is not appropriate to automatically follow a 1200m distance to determine a walkable catchment to a planned rapid transit stop. Nowhere in the NPS-UD does it mandate for Tier 1 or Tier 2 Councils that they should apply a 1200m walkable catchment to a rapid transit stop. In Auckland as part of Plan Change 78, I note that the Council applied an 800m walkable catchment (10 minute walk) around existing and planned rapid transit stops. I would agree that for 'high pulling' locations such as the town centre, which incorporates a wide range of services and community facilities as well as a rapid transit stop that an average person will have a higher propensity to walk further.
- 20 As discussed in paragraphs 13-14 the western end of the notified TPLM Variation is generally within a 15minute (1200m) walk of the town centre and certainly would be within a maximum 400-500m walk of the proposed bus stop on SH6 near the Stalker Road intersection.
- 21 Paragraph 29 of Mr Church's evidence raises a number of questions about the walkability to the town centre which he considers is not strictly centrally located and states this "could be more optimally addressed with the provision of a complementary western neighbourhood centre".
- 22 Whilst I agree that the location of the town centre is slightly 'off centre' as identified by Mr Church, this is driven by the necessity of providing a town centre that is conveniently located to serve the existing Lake Hayes Estate and Shotover Country area as well as the new Ladies Mile zonings, and the fact that the existing Howards Drive provides a direct access into the town centre and also links the Council's 516 park/community hub closely with the town centre. Given the topography and development patterns on the south side of SH6 there are no other practical options to connect the town centre other than the possible

Sylvan Street link shown at the eastern end of the Councils 516 site, which is near the eastern boundary of the proposed urban extent.

- 23 The TPLM Masterplan and the TPLM Variation are based on a number of objectives, design principles and key features which are outlined in paragraphs 47-59 of my Evidence in Chief. It is important to note that one of the fundamental constraints on the TPLM Masterplan is the significant transport limitations on SH6 (Shotover Bridge in particular), with a maximum supportable 2,400 additional dwellings (including significant mode shift and travel demand management initiatives). It is noted that the Transport JWS confirms that the “experts agree that the modelling to date is acceptable and it represents the current/future situation”.⁶
- 24 Other key features of the TPLM Masterplan include:
- (a) creating a central Commercial Precinct (Town Centre) which is compact and walkable urbanism which support a strong central town centre (that is generally within a 10-15 minute walk for the Ladies Mile Zoning while also being easily accessible from the existing Lakes Hayes Estate and Shotover Country residential areas;
 - (b) The town centre acts as a focal point for the existing communities and the proposed development of the Ladies Mile zone; and
 - (c) Integrated Stormwater solutions
- 25 As discussed in paragraphs 13-14 above these factors all led to informing the western extent of the TPLM Masterplan including the importance of having a strong centrally located community heart including the town centre and various centrally located community facilities.
- 26 Although expert evidence suggests that the importance of the town centre is overstated (Church paragraph 27), it is my view that it is a fundamental part of the urban design framework of the TPLM Masterplan and that given the relative close proximity of the significant employment, retail and community facilities in the wider Frankton area that ensuring a strong locally focussed town centre (& community heart)

⁶ Transport JWS dated 30 October 2023, at page 1.

east of the Shotover Bridge is essential to serve local needs and meet the objectives of the TPLM zone.

- 27 It is my view that the issues raised in Mr Church's evidence regarding the proposed Extension Area (Anna Hutchinson Family Trust Land) and the suggested western neighbourhood centre, are inextricably linked and that there is only logic for a small specific centre to be zoned if the Extension Area was to be included in the Variation and subject to a size limitation of 2000m² gross site area as outlined in paragraph 22 of Natalie Hampson's rebuttal evidence. I also note that in the Economics JWS (point 10.a) the experts agree that if the extension area is included "there is merit in including a neighbourhood centre (i.e. a few shops) providing amenity and services, located at the western end of the TPLM Variation as notified."
- 28 However, without the Extension Land being included in the TPLM Variation, there is a strong logic for the one primary centre approach as per the TPLM masterplan and notified Variation, where most people are within a 10-15 minute (800-1200m walk) from the town centre.
- 29 It is noted that the TPLM Variation enables commercial activities up to 100m² (per site) as a Restricted Discretionary activity in the Medium Density Residential Precinct, which could form the basis of local small scale services/retail if there was strong demand, although it is acknowledged that the exact location of this would be up to market forces.

Layout of a Proposed Western Node

- 30 If the Hutchinson land were to be included in the TPLM Variation (as discussed above in Paragraphs 27) then I consider there is some merit in a small commercial node at the western end of the TPLM Structure Plan from an urban design perspective. Mr Bruce Weir in the appendix to his evidence includes a more detailed structure plan layout as to how the Extension Area could be included in the TPLM Structure Plan which includes the integration of a western neighbourhood centre as part of the possible changes to the Masterplan and Structure Plan. His proposed centre layout is similar to that of the 'optimised' road layout of Lower Shotover Road identified in paragraph 57 of Mr Church's evidence.

- 31 The location and spatial layout of a commercial node raises a number of concerns that need to be addressed before I could support its inclusion in the TPLM Variation including:
- (a) Uncertainty of whether there will definitely be a signalised intersection or not at Stalker Road and therefore implication on how Lower Shotover Road connects to SH6.
 - (b) Signalisation at Stalker Road would have implications/changes to the roading layout of the western end including a reconfiguration of Local Road Type E to connect for vehicles (at SH6) including a need to be upgraded to a potential Collector Road to link to the East-west collector and maintain views from the Stalker intersection to Slope Hill.
 - (c) Signalisation will require potential relocation of bus stops to be closer to the signalised intersection (for convenience and legibility).
 - (d) The lower Shotover Road 'optimised' realignment as drawn on Mr Weirs appendix (Figure 8B) and in Mr Church's evidence is very circuitous and results in inefficient development parcels.
 - (e) Ensure there are clear and legible connections with the internal east -west collector road and potential changes to the status of Local Road Type E as shown in the Structure Plan of the TPLM Variation.
 - (f) Ensure legible linkages to Spence Road and old Shotover bridge - This is the easiest gradient route to the bridge. (circa 4.5% gradient) as opposed to steep terraces that need to be negotiated through the Hutchinson land.
 - (g) The neighbourhood node is not well connected with the realigned Lower Shotover Road in terms of capturing passing trade and improving commercial viability and legibility.
 - (h) Disconnection from the neighbourhood park and placemaking opportunity.
 - (i) Given the emphasis of the town centre as the primary centre for the eastern side of the Shotover River and suggested restriction of a western centre being limited to 2000m² gross (refer paragraph

27 above), is the proposed medium density sufficient or is a local higher density precinct appropriate?

- (j) Bus routes are intended to run along SH6 and any deviation from that would be inefficient. Circuitous public transport routes incorporating both express and local services are inefficient are not supported by Colin Shields (refer JWS Transport and paragraph 47 of his rebuttal evidence)

- 32 In summary there are many uncertainties around the final alignment of the future intersection details, the optimal location for Lower Shotover Road realignment, bus stops and the location of a western commercial node. I am not convinced that the proposed roading realignment, sizing and location of the commercial centre as proposed in the evidence of Mr Church and Weir can be incorporated into the Structure Plan without further detailed analysis including with expert transport input into the matters raised above.

Conclusion

- 33 The design response of the TPLM Masterplan and TPLM Variation does take into account a wide range of opportunities and constraints including an understanding of the wider context including the Te Kirikiri Frankton Masterplan and other local centres such as Kawarau Park and how Ladies Mile fits into the wider Queenstown Whakatipu area.
- 34 There is a clear rationale for the western boundary of the TPLM Masterplan and TPLM Variation, which is based on higher densities supporting a centrally located town centre/community heart with all residents of the new Ladies Mile zone being within a 10-15 minute walk (800-1200m) of the town centre.
- 35 The proposed location and layout of the western centre (if the Hutchinson land was to be included in the TPLM Variation) cannot be supported without further consideration of a number of factors including its appropriate sizing, details of signalised intersections and bus stops and realignment of key roading including Lower Shotover Road, the East West Collector and the Local Road Type E shown on the Structure Plan.

Roland Bruce Harland

10 November 2023