

**BEFORE THE INDEPENDENT HEARING PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

Under the	Resource Management Act 1991
In the matter	of the Urban Intensification Variation to the proposed Queenstown Lakes District Plan

**REBUTTAL EVIDENCE OF RICHARD KNOTT
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

ARROWTOWN – HERITAGE AND CHARACTER

24 July 2025



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1. QUALIFICATIONS AND EXPERIENCE

1.1 My full name is Richard John Knott.

1.2 I prepared Evidence regarding Arrowtown – Heritage and Character, and Queenstown – Heritage Buildings for Queenstown Lakes District Council (**QLDC** or **Council**) dated 6 June 2025 (**EiC**) on the Urban Intensification Variation (**UIV** or **Variation**).

1.3 My qualifications and experience are set out in my EiC at paragraphs 1.2 to 1.8.

1.4 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. SCOPE OF REBUTTAL EVIDENCE

2.1 My Rebuttal Evidence is provided in response to the following evidence and statements:

- (a) Heike Brigitte Lutz for Friends of Arrowtown Village (1272), dated 4 July 2025.
- (b) Louise and Justin Wright (747), dated 8 July 2025.

2.2 I have also read and considered the following statements of evidence (or lay statements) and have taken them into account in preparing my rebuttal evidence, but consider no specific response is necessary:

- (a) Philip Blakely for Friends of Arrowtown Village (1272) dated 4 July 2025.
- (b) Mark Hosie for Friends of Arrowtown Village (1272) dated 9 July 2025.
- (c) David Clarke (1157) dated 9 July 2025.

2.3 Where I do not respond to a particular evidence statement, or general theme, this does not mean I have not considered the subject matter, but that I have nothing further to add and my views remain as expressed in my EiC.

2.4 The “Rebuttal Recommended Provisions”, as recommended in Council’s rebuttal, is included at Appendix A of Ms Bowbyes’ Rebuttal Evidence.

3. BUILDING HEIGHT AND DENSITY IN THE LDSRZ AND MDRZ AT ARROWTOWN

3.1 Whilst Ms Lutz accepts much of my EiC, she disagrees with my conclusion that the s42A recommended provisions will ensure that Arrowtown’s sense of place, and character and heritage values will be maintained.¹

3.2 In particular Ms Lutz is of the opinion that (in summary):

- (a) Increasing the building height enabled in the Lower Density Suburban Residential Zone (**LDSRZ**) from 6.5m to 8m could facilitate a three-storey built form,² and that 8m high buildings would be visibly dominant and would shift the perceived scale and character of Arrowtown’s existing townscape; and
- (b) Increasing the height limit in the Medium Density Residential Zone (**MDRZ**) from 7m to 8m + 1m for pitched roof forms will result in the realistic possibility for three-storey built form,³ that even a 1-metre increase can materially alter building proportions, increase shading and dominance effects, and contribute to a gradual but tangible shift away from Arrowtown’s traditional built character.⁴

LDSRZ

3.3 Pursuant to s42A Rule 7.5.1.2b, any building between 6.5m and 8m high in the LDSRZ would require resource consent as a Restricted Discretionary activity. The matters of discretion allow consideration of consistency with Arrowtown’s character, as described in the Arrowtown Design Guidelines 2016 (**ADG 2016**), consideration of sunlight, shading and privacy effects on adjacent sites and/or their

1 EiC Heike Lutz, paragraph 69.

2 EiC Heike Lutz, paragraph 70.

3 EiC Heike Lutz, paragraph 71.

4 EiC Heike Lutz, paragraph 71.

occupants and of the external appearance and visual dominance of the buildings as viewed from the street and adjacent properties.

- 3.4** I consider that the Restricted Discretionary activity status and associated matters of discretion allow for building over 6.5m in the LDSRZ to be required to be designed so that they would fit comfortably with the Arrowtown character, and sunshine, shading and privacy effects on neighbours would be appropriately considered and managed.
- 3.5** The application of recession planes, setbacks and site coverage rules will further influence the bulk and location of buildings and limit the effects of increased heights. Pursuant to s42A Rule 7.5.1, any building above 8m would be a non-complying activity, and therefore not anticipated.
- 3.6** In relation to the likelihood of a three-storey building being designed within the 8m height standard, in my experience I would anticipate that new houses would have a floor to ceiling height of 2.4m, and a floor-to-floor height of 2.7m:
- (a) Ground floor – floor to floor 2.7m
 - (b) First floor - floor to floor height 2.7m
 - (c) Second floor, floor to ceiling height 2.4m
 - (d) Total: 7.8m + roof structure.
- 3.7** Based on this, I consider that it would be very difficult to deliver a three-storey building within the Restricted Discretionary 8m height limit, particularly given the expectation that buildings will not have a flat roof. In addition, any building greater than 6.5m and less than 8m would be subject to the relevant matters of discretion, as discussed above, which would provide a further opportunity to consider the appropriateness of the design and external appearance of the building.
- 3.8** I also note that Lousie and Justin Wright (747) consider⁵ that the s42A recommended heights bring no floor area benefits to developments in both the MDRZ and LDSRZ. I take this to mean that they do not anticipate that new buildings will contain more than two levels.

5 Statement of Louise and Justin Wright, page 9, Section 14.

- 3.9** Overall and based on the above, in response to Ms Lutz, I do not consider that the proposed updated rules would facilitate a three-storey building within the LDRZ.

MDRZ

- 3.10** In relation to the MDRZ, I accept that the updated building heights recommended in the s42A (8m + 1m for pitched roof forms) could bring a greater possibility of a three-storey building. However, I consider that these height increases must be seen within the context of the activity status for new dwellings in the MDRZ.
- 3.11** Mr Wallace, at section 16 of his urban design evidence dated 6 June 2025, has provided modelling that shows indicative bulk / massing potential of the s42A recommended provisions for the MDRZ at Arrowtown. Mr Wallace based his modelling on a typical sized site within the MDRZ at Arrowtown (570m²).
- 3.12** As shown in Mr Wallace's modelling, the s42A recommended building height of 8m plus 1m for roof forms (s42A Rule 8.5.1.3), combined with the s42A recommended recession planes (s42A Rule 8.5.7) would result in very limited opportunity for 3-storey development in the MDRZ at Arrowtown. Any proposal to breach s42A Rule 8.5.1.3 would require non-complying activity resource consent.
- 3.13** Whilst Rule 8.4.6 generally allows one residential unit per site in the MDRZ in Arrowtown as a permitted activity, within the Arrowtown Historic Management Transition Overlay (**AHMT**O) area all residential units require Restricted Discretionary activity consent pursuant to Rule 8.4.10.1.
- 3.14** The AHMT O is that part of the MDRZ which is located on the boundary of the Arrowtown Residential Historic Management Zone (**ARH**MZ). I consider that the associated matters of discretion in Rule 8.4.10, which include consideration of consistency with Arrowtown's character utilising the ADG as a guide, will provide appropriate opportunity to consider the effects of new development within the AHMT O.

- 3.15** Elsewhere, within the Arrowtown MDRZ, where one dwelling per site is a permitted activity (Rule 8.4.6), I do not agree with Ms Lutz regarding the effects of the additional 1m building height and additional 1m for pitched roof form. These other areas, outside of the AHMTO, are less sensitive as they do not have such a close relationship with the ARHMZ, although they do include areas which are visible on key routes into the township (as discussed in my EIC).
- 3.16** In particular, as noted in my EIC, much of the MDRZ (and LDSRZ) are visible from important routes of entry to the township, when both outside the township. An example is from Malaghans Road where it is possible to view reasonably deep into the MDRZ, and within the township, such as Berkshire Street and Centennial Drive.
- 3.17** These routes and locations make an important contribution to an understanding of the wider location and sense of place of Arrowtown. I consider that the s42A recommended revised heights for the LDSRZ and MDRZ will have little impact when viewed from outside of the township and will ensure that the clarity of the terrace is maintained.
- 3.18** On those routes within the township, I consider that buildings constructed to the s42A recommended revised heights would not be so tall that they would appear out of keeping with existing lower buildings within the MDRZ (and adjacent areas) and will also ensure that an appropriate transition from town to country will be maintained
- 3.19** Whilst I remain of the view that the notified MDRZ heights would impact the fine balance of the existing Arrowtown character and sense of place, I consider that the s42A recommended revised heights will ensure that the current sense of place, character and heritage values of the township will be maintained.

4. WHETHER THE S42A RECOMMENDED HEIGHTS WILL ENABLE ADDITIONAL FLOOR AREA

- 4.1** While the statement from Louise and Justin Wright (747) is joint and not stated to be subject to the Environment Court Code of Conduct, I acknowledge that the

submitters are registered architects and have experience in designing numerous buildings in Arrowtown. I have been asked to consider their statement for any relevance to my heritage, character and urban design expertise.

4.2 As mentioned above Louise and Justin Wright⁶ state that two storey development is already enabled by the PDP in both the LDSRZ and MDRZ, and that the s42A Restricted Discretionary height limit in the LDSRZ, and Permitted height limit in the MDRZ would not increase development capacity.

4.3 I disagree. I consider that the s42A height limits will more easily allow the design and construction of two storey dwellings, and will likely allow a more usable first floor area than could be achieved under the PDP.

4.4 In addition, I note that Ms Fairgray confirms⁷ that she has conducted further capacity modelling to test the s42A MDRZ rules and has found that these dwellings would still be likely to be commercially feasible as a result of the high prices within the market and that the s42A recommended rules would still enable the market to deliver a greater range of dwellings in comparison to the existing lower density pattern of development in Arrowtown.

5. KENT STREET MASS STUDIES

5.1 Louise and Justin Wright include mass studies to illustrate the potential bulk and mass of developments possible under the s42A MRRZ rules.⁸

5.2 The images on page SK2 illustrate the additional 'building envelope' delivered by the s42A MDRZ rules relative to the PDP. It is significant to note that:

- (a) In each of the three examples, the additional building envelope appears relatively small compared to the volume of the envelope available under the PDP; and
- (b) The 'middle' townhouse example indicates a three-storey development. For the reasons set out above, I consider that the s42A rules would bring

6 Statement of Louise and Justin Wright, page 9, Section 14.

7 EIC Susan Fairgray, paragraphs 6.57 to 6.59.

8 Statement of Louise and Justin Wright, page 68, Appendix 8 - Kent St Mass Studies.

very limited opportunity for 3-storey development in the MDRZ at Arrowtown.



Richard John Knott

24 July 2025