

Corinne Frischknecht for QLDC – Summary Statement for Town Centre and Business Zones

1. My Town Centre and Business Zones text evidence addresses planning matters associated with the following chapters to the Proposed District Plan (**PDP**):
 - (a) Chapter 12 – Queenstown Town Centre (**QTCZ**)
 - (b) Chapter 13 - Wānaka Town Centre (**WTCZ**)
 - (c) Chapter 15 - Local Shopping Centre Zone (**LSCZ**)
 - (d) Chapter 16 - Business Mixed Use (**BMUZ**).
2. Intensification in commercial centres, including greater building heights and density standards assists with implementing Policy 5 of the NPS-UD, which seeks to enable greater housing supply and more intensive development in areas with high accessibility and demand.
3. The notified provisions, alongside recommendations through my 42A report and rebuttal evidence, also aligns with the outcome and directive in Objective 1 and Policy 1 of the NPS-UD in providing for well-functioning urban environments and enabling people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future. These recommendations also help ensure that planning frameworks are efficient, improve plan clarity, and responsive to urban growth pressures. Ms Bowbyes' evidence has discussed these outcomes sought by the NPS-UD in detail in her s42A on Strategic Evidence.
4. In my view, the recommended framework provides an appropriate balance between meeting the requirements under Policy 5, as well as meeting Objective 1 and Policy 1 and contributing to well-functioning urban environments.
5. The submissions on the commercial centres express a mix of support and opposition to the notified changes to these chapters. The main issues raised by the submitters are the appropriateness of the:
 - (a) Objective, policies and rule frameworks for each zone; and
 - (b) Bulk and Location standards within each zone, particularly the effects on character and amenity resulting from increased heights in the QTCZ and WTCZ.

Chapter 12 - Queenstown Town Centre

6. The QTCZ has the highest level of accessibility and relative demand in the urban environment. To give effect to Policy 5 of the NPS-UD, the notified UIV proposes a number of changes to the QTCZ provisions, including increased permitted heights and densities. The notified amendments are underpinned by an Accessibility & Demand Assessment that has considered the level of accessibility and relative demand for housing and business use in the centre.
7. In response to submissions and further submissions received on the QTCZ I recommended the following amendments to the notified provisions in my S42A Report:
 - (a) Amendments to PDP Policy 12.2.2.3c to replace 'public places' with 'land zoned Open Space' in reference to maintaining sunlight access;
 - (b) Amendments to Notified Rule 12.5.8 to amend the heading of the rule to acknowledge that it refers to façade height as well as setback of upper floors, and apply tiered approach for setbacks of upper floors; and make an exemption for boundaries adjoining Cow Lane, Searle Lane or the pedestrian links;
 - (c) Amend the Height Precinct Plan and PDP Rule 12.5.9 Maximum building height to include additional Precinct 6 with a height limit of 8m, and include Area A within Height Precinct 3 where maximum height shall be taken from masl; and
 - (d) A minor amendment to Notified Rule 12.5.11 Minimum Ground Floor Height so that it refers to floor to floor rather than floor to ceiling.
8. Having considered the submissions and evidence, in my rebuttal evidence, I have recommended the following additional amendments to the text of Chapter 12:
 - (a) Amendments to the Height Precinct Plan to: Reclassify 2 and 22 Earl Street from Height Precinct 3 to Height Precinct 4; Reclassify 11-15, 17 and 19 Rees Street from Height Precinct 2 to Height Precinct 3; and create a new Height Precinct (7) for 48 – 50 Beech Street with amendments to Rule S42A 12.5.9 Maximum building to include a new maximum building height of 15m for Height Precinct 7.
 - (b) Amendments to Rule 12.5.9 so that building height at 10 Man Street is measured from a fixed datum point on the property, being RL 326.5 masl.
 - (c) Amend the advice note in Rule 12.5.8 to say "Rule 12.5.8" rather than "this rule" and remove matter of discretion *d) any sunlight or shading effects created by the proposal on adjacent sites and/or their occupants.*

9. The key outstanding matters of disagreement that were of particular interest to submitters are:
- (a) That *Rule 12.5.11 Minimum Ground Floor Height* should only apply to new buildings. Even though I agree that there are some circumstances where this may be impractical or unnecessary within an existing building, such as minor alteration or an addition to the rear of an existing building, I stand by my view that this is more appropriately assessed on a case-by-case basis through the resource consent process (rather than as a permitted activity).
 - (b) Greater or lesser heights in QTCZ - I am of the view that the heights as notified, including amendments through my S42A and rebuttal evidence, provide an appropriate balance between giving effect to Policy 5 by enabling heights and density of urban form commensurate to the level of accessibility or relative demand, as well as meeting Objective 1 and Policy 1 and contributing to well-functioning urban environments.

Chapter 13 - Wānaka Town Centre

10. The Wānaka Town Centre is also identified as an area of high accessibility in the Accessibility & Demand Analysis because of its access to multiple food retailers, quality open space and access to employment, albeit slightly lower than QTCZ. This is reflected in the slightly lower building heights recommended in the Wānaka town centre than Queenstown town centre.
11. The notified UIV proposed a number of changes to the WTC to give effect to Policy 5 of the NPS-UD, primarily via increased heights and densities. To support the increased heights recommended in Wānaka town centre I also recommend that the core design principles of the Wānaka Town Centre Character Guideline are incorporated into the policies and matters of discretion in Chapter 13 to ensure they are given greater statutory weight in decision making.
12. In response to submissions and further submissions received on the WTCZ I recommended the following amendments to the UIV in my S42A Report:
- (a) Amendments to PDP Policy 13.2.2.3 to provide policy support for a sixth storey where high urban design outcomes can be achieved;

- (b) Three new policies that sit under PDP Objective 13.2.3 to embed key urban design outcomes from the WTCZ Town Centre Character guidelines into the PDP policy to give them more statutory weight;
 - (c) An additional policy under PDP Objective 13.2.3 and amendments to Notified Rule 13.5.10 that allows for buildings between 16.5m and 20m in the Town Centre in situations when the outcome is of high quality design; and the additional height would not result in shading that would adversely impact on adjoining Residential zone and/or public space or does not dominate the streetscape;
 - (d) Amendments to the matters of discretion in Notified Rule 13.4.4 that applies to all buildings in the WTCZ that refer to planned built form and consideration of appropriate lighting in public spaces;
 - (e) Amendments to Notified Rule 13.5.9 Building height setback at upper floors that provides a tiered approach for requiring setbacks at upper floors;
 - (f) Minor amendment to Notified Rule 13.5.16 Minimum Ground Floor Height so that it refers to floor to floor rather than floor to ceiling; and
 - (g) Amendments to Notified Rule 13.6 – Non-Notification of Applications to include Rule 13.5.9 Building height setback at upper floors, Rule 13.5.15 Outlook Space (per unit) and Rule 13.5.16 Minimum Ground Floor Height and that these Restricted Discretionary activities will not be publicly notified but notice will be served on those persons considered to be adversely affected if those persons have not given their written approval.
- 13.** No evidence was received in regard to the WTCZ text and therefore no further changes were recommended in my rebuttal evidence.
- 14.** The key outstanding matters of disagreement that were of particular interest to submitters are:
- (a) Reduced heights in WTCZ - A key concern and rationale for many submissions in opposition is the effects on character and amenity arising from increased permitted height. In my view, the suite of urban design amendments proposed through the notification of the Variation, as well as the amendments recommended in my s42A report, provide an appropriate framework to give effect to Policy 5 of the NPS-UD as well as support the provision of quality amenity and design outcomes for residents and visitors in the WTC.

- (b) That Rule 13.5.9 Building Height setback at upper floors is considered to be a constraint on achieving a practical and commercially feasible design. In my view, this standard remains important in controlling the height, scale, appearance and location of buildings in order to achieve a built form that complements the existing patterns of development and is consistent with the amenity values of the town centre.

Chapter 15 - Local Shopping Centre Zone

- 15. The LSCZ enables small scale commercial and business activities in discrete pockets of land, that are accessible to residential areas. With the exception of the LSCZ located at Frankton, these centres are generally not located in areas of higher accessibility within the district. As such, it was not considered necessary to notify significant changes to the current LSCZ to give effect to Policy 5 of the NPS-UD.
- 16. In response to submissions and further submissions received on the LSCZ I recommended the following amendments to the UIV in my S42A Report:
 - (a) Amendments to Notified Rule 15.5.7 Building Height to increase the height for the LSCZ at Lake Hāwea South from 12m to 14m.
- 17. Having considered the evidence filed, in my rebuttal evidence I have also recommended that the height limit for Hāwea LSCZ is increased from 10m (as notified) to 14m. This is because retaining or reducing existing building heights would result in a built form that is lower than the surrounding residential zoned land and, in my view, would not integrate well with its surrounding urban environment. In regard to greater heights, these have been informed by Urban Design expertise and in my view provide an appropriate balance of meeting the requirements of the NPS-UD, by enabling heights and density of urban form commensurate with the greater of level of accessibility or relative demand and contributing to well-functioning urban environments.
- 18. Whether heights in other LSCZ should be reduced or increased is the key outstanding matter of disagreement that was of particular interest to submitters in relation to Frankton, Kelvin heights and Lake Hāwea South. In his evidence, Mr Wallace has reassessed each of the heights / recession planes that apply to the LCSZ. Based on the assessment undertaken by Mr Wallace, which underpins the proposed building heights and recession planes, I consider

that the heights for the LSCZ as notified and recommended through my s42A report and rebuttal evidence, are appropriate to meet the requirements of the NPS-UD, particularly Objective 1, and Policies 1 and 5 by enabling heights and density of urban form commensurate with the greater level of accessibility or relative demand and contributing to well-functioning urban environments.

- 19.** In my view, retaining or reducing existing building heights would result in a built form that is lower than the surrounding residential zoned land and, would not integrate well with its surrounding urban environment and would be inconsistent with SOs 3.2.1 and 3.2.3 of the PDP.

Chapter 16 - Business Mixed Use

- 20.** The BMUZ is primarily located in fringe areas north of Queenstown Town Centre, Frankton Marina, north of Frankton Road, north of Wānaka Town Centre and at Three Parks Wānaka. The Accessibility & Demand Analysis indicates that these areas feature between high and moderate levels of accessibility and this has been reflected in the varying heights notified for the BMUZ to give effect to Policy 5 of the NPS-UD.
- 21.** In response to submissions and further submissions received on the BMUZ I recommended the following amendments to the UIV in my S42A Report:
- (a) Amendments to Rules 16.5.8 and 16.5.9 to increase discretionary building heights in the Wānaka (Three Parks) BMUZ to 16.5m, and maximum building height to 20m.
- 22.** No evidence was received in regard to the BMUZ text and therefore no further changes were recommended in my rebuttal evidence.
- 23.** The key outstanding matters of disagreement that were of particular interest to submitters are greater height are sought in the BMUZ, particularly in Frankton North and reduced heights in Wānaka (excluding Three Parks).
- 24.** The heights recommended for BMUZ by the Urban Design Report have been considered against the height limits proposed for the Town Centre Zones and residential zones. In my view it is important to consider them collectively, in order to contribute to a package that

supports a well-functioning urban environment and enables appropriate intensification throughout the district which gives effect to SO 3.2.1.8 and particularly SP 3.2.1.2 - that the Queenstown and Wānaka town centres are the hubs of New Zealand's premier alpine visitor resorts and the district's economy. In regard to Frankton North, retaining a maximum height limit of 20m assists in signalling QTC as the "highest order" centre across the District. I consider the notified building heights, and tiered approach for building heights in Frankton North, remain most appropriate due to its location and site constraints as outlined in my rebuttal evidence.

Summary

25. Overall, I consider that the changes proposed to the Town Centre and Business Zones, including my recommended amendments through my S42A and rebuttal evidence, are the most appropriate to give effect to:
- (a) Policy 5 of the NPS-UD, including greater heights and density standards in areas with high accessibility and demand;
 - (b) Objective 1 and Policy 1 of the NPS-UD in providing for well-functioning urban environments and enabling people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
 - (c) Implement PDP strategic directions, particularly, SO 3.2.1¹ and 3.2.2² and SP 3.2.1.2³ and 3.2.2.1.⁴

Corinne Frischknecht

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¹ The development of a prosperous, resilient and equitable economy in the District.

² Urban growth is managed in a strategic and integrated manner.

³ The Queenstown and Wānaka town centres are the hubs of New Zealand's premier alpine visitor resorts and the District's economy.

⁴ Urban development occurs in a logical manner so as to: promote a compact, well designed and integrated urban form and ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in.