

*under:* the Resource Management Act 1991

*in the matter of:* Submissions and further submissions on Queenstown  
Lakes Proposed District Plan 2023

*and:* Urban Intensification Variation

*and:* **Scenic Hotel Group Limited (SHG)**  
(Submitter 763)  
(Further Submitter 1347)

**Millenium and Copthorne Hotels New Zealand  
Limited (MCH)**  
(Further Submitter 1344)

**Hospitality Group Limited (HG)**  
(Further Submitter 1345)

Supplementary Memo of John Edmonds

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Dated: 22 August 2025

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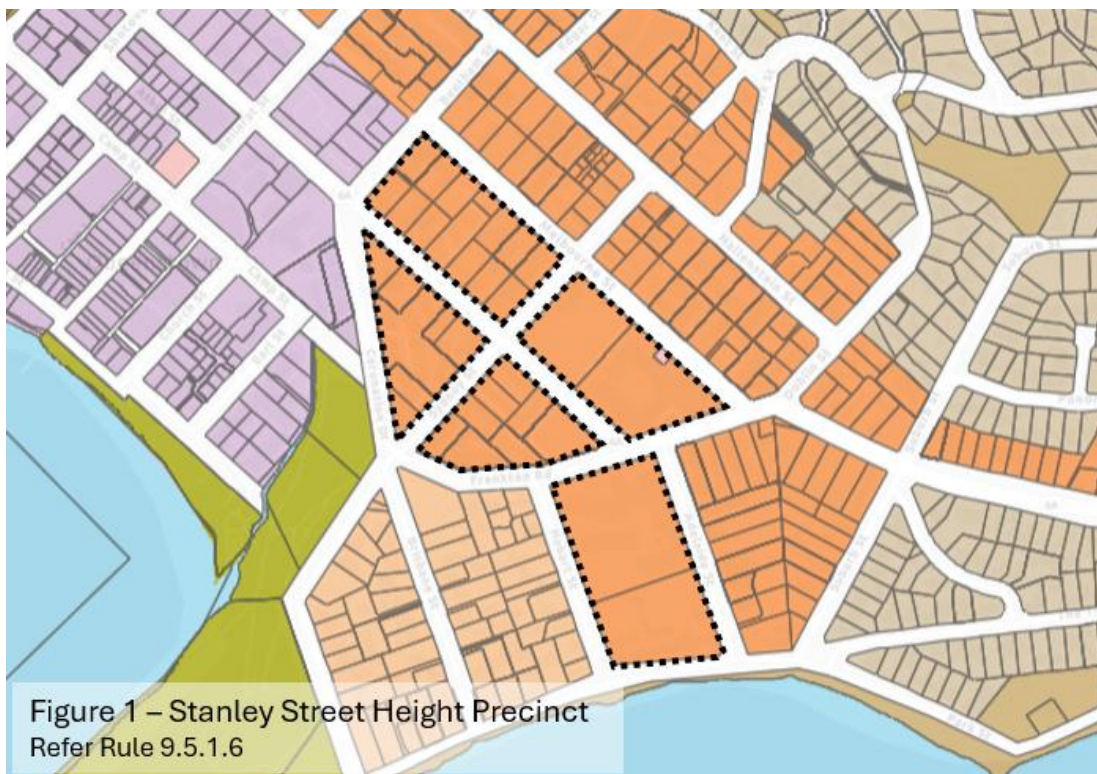
## SUMMARY MEMORANDUM OF JOHN EDMONDS

1. My full name is John Bernard Edmonds.
2. I prepared a statement of evidence dated 4 July 2025 in support of the Submitter's requested relief and attended the hearing on 7 August 2025. I presented a map of the submitters land relative to the location of the additional height precinct sought by Pro Invest NZ Property Limited (986) and Ashourian Partnership (1008).
3. Pro Invest and Ashourian had submitted that a height precinct be identified in the HDRZ in the block bound by Frankton Road, Coronation Drive, Beetham Street and Melbourne Street. The submission sought a permitted building height of 18.5m rather than 16.5m.
4. SHG, MHC and HG made a further submission in support of that relief.
5. Through the course of preparing evidence Mr. Freeman, on behalf of Pro Invest and Ashourian, sought amended relief:
  - (a) The permitted building height will remain at 16.5m as per s42A Rule 9.5.1.1.
  - (b) Building height between 16.5m and 20m will be a restricted discretionary activity, but with the application of a non-notified rule via Rule 9.6.1.2. This approach is the same for the land in the HDRZ that is contained at Frankton North.
6. At the hearing I undertook to provide my feedback on how the relief sought in the further submissions by SHG, MHC and HG could be incorporated into the provisions for the HDRZ.
7. I have included those suggested changes in the Table below and included a suggested map of the Stanley Street height precinct for inclusion in the HDRZ.

9.5.1	Building Height	
	9.5.1.1 A height of 16.5 metres, including at Frankton North and Wānaka (Three Parks), except where specified in Rules 9.5.1.2, 9.5.1.3 <del>or</del> 9.5.1.4, <u>9.5.1.5</u> or <u>9.5.1.6</u> .	RD Discretion is restricted to: <ol style="list-style-type: none"> <li>a. building design and appearance, including roof form articulation and the avoidance of large, monolithic building forms;</li> <li>b. building dominance and sunlight access relative to neighbouring properties and public spaces including roads;</li> <li>c. how the design advances housing diversity, including size and typology; and</li> <li>d. promotion of es sustainability either through construction methods, design or function;</li> <li>e. privacy and outlook for occupants of the subject site and neighbouring sites;</li> </ol>

		<p>f. effects on significant public views (based on an assessment of public views undertaken at the time of the proposal, in addition to any specified significant public views identified within the District Plan);</p> <p>g. the positive effects of enabling additional development intensity within close proximity to town centres.</p>
	9.5.1.2 In the High Density Residential Zone immediately west of the Kawarau Falls Bridge the maximum building height shall be 10m provided that in addition no building shall protrude above a horizontal line orientated due north commencing 7m above any given point along the required boundary setbacks at the southern zone boundary.	D
	9.5.1.3 Within the area specified on the District Plan web mapping application on the south side of Frankton Road (SH6A), the highest point of any building shall not exceed the height above sea level of the nearest point of the road carriageway centreline.	D
	9.5.1.4 In Wānaka (excluding Three Parks) and Arthurs Point the maximum building height shall be 12m.	D
	<u>9.5.1.5</u> Frankton North. the maximum building height shall be 20m.	NC
	<u>9.5.1.6</u> In the Stanley Street height precinct (refer Figure 1 at end of this chapter) a height of <u>18.5m</u>	<p>RD</p> <p>Discretion is restricted to:</p> <p>a. building design and appearance, including roof form articulation and the avoidance of large, monolithic building forms;</p> <p>b. building dominance and sunlight access relative to neighbouring properties and public spaces including roads;</p>

		<p>c. how the design advances housing diversity, including size and typology; and</p> <p>d. promotion of es sustainability either through construction methods, design or function;</p> <p>e. privacy and outlook for occupants of the subject site and neighbouring sites;</p> <p>f. effects on significant public views (based on an assessment of public views undertaken at the time of the proposal, in addition to any specified significant public views identified within the District Plan);</p> <p>the positive effects of enabling additional development intensity within close proximity to town centres.</p>
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8. For completeness I include the following Section 32 AA analysis for the suggested change.
- 8.1 Identification of a height precinct will more efficiently and effectively achieve the relevant objectives of the Variation.
- 8.2 This is a discrete area that is developed almost exclusively for visitor accommodation activity. Establishing buildings of a greater scale close

to the town centre and adjacent to primary and arterial transport routes will result in a cohesive built form.

- 8.3 Identification of a height precinct is an appropriate way of achieving the objectives of the NPS-UD, including Objectives 1 and 3 to provide for well-functioning urban environments and enable more people to live in urban areas near employment and transport opportunities or with high housing and business demand.
- 8.4 The benefits are considered to outweigh the costs. There is a missed opportunity cost if this land is not assessed for rezoning through the Variation, particularly in light of findings in the Accessibility and Demand Analysis Method Statement.
- 8.5 The risk of not acting includes uncertainty for landowners and potential resource consent costs.
- 8.6 I do not consider a need to assess the risk of acting or not acting as there is sufficient information available to make a decision on the matter.

Dated: 22 August 2025

**John Edmonds**