

**Before the Hearing Commissioners
at Queenstown**

In the Matter of

the Resource Management Act
1991

And

In the Matter of

a proposed variation to the
Queenstown Lakes Proposed
District Plan – Urban Intensification
Variation

**Summary Statement of
Paula Marie Costello
for multiple Queenstown submitters**

Dated: 6 August 2025

Lane Neave
2 Memorial Street
Queenstown
Solicitor Acting: Joshua Leckie
Email: Joshua.leckie@laneneave.co.nz
Phone: 03 372 6307

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INTRODUCTION

Qualifications and Experience

1. My name is Paula Marie Costello. I am a Director of Williams and Co., a Queenstown-based planning and urban design consultancy.
2. I have the qualifications and experience set out at paragraphs 2-5 of my statement of evidence dated 4 July 2025.
3. I reconfirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023.

KEY POINTS

4. I support of the intent of the Intensification Variation as notified in order to give effect to the NPS-UD.
5. I note that there are no outstanding areas of disagreement between myself and Council's Urban Design expert Mr Cameron Wallace. This includes agreement reached via expert conferencing, the results of this conferencing are recorded in the Joint Witness Statement (**JWS**) dated 16 July 2025.
6. However, there remains areas of disagreement between this position and the recommendations of Council planning officers within rebuttal evidence. I will summarise the key points in regard to these matters below.

Stanley Street and Melbourne Street Properties Height Precinct

7. I remain of the view that this area of the High Density Residential Zone in proximity to the town centre is an appropriate location for building heights up to 20m.
8. Whilst Council proposes a Restricted Discretionary status for buildings above 16.5m and Ms Frischknecht considers that this provides a suitable pathway for consideration of buildings up to 20m, I maintain a view that greater certainty for building height up to 20m in this location would better give effect to the NPS-UD.
9. I consider that this can be achieved by way of a non-notification clause for buildings between 16.5m and 20m, and the removal of the matter of

discretion which refers building dominance and sunlight access relative to neighbouring properties.

Recession Planes in the Lower Density Suburban Residential Zone (LDSRZ)

10. I consider that the proposed change to the PDP standards recommended by Ms Bowbyes, to apply recession planes to Sloping Sites in the LDSRZ will have a limiting effect on the *existing* development capacity within the LDSRZ in Queenstown, and will not facilitate the level of intensification intended by the variation.
11. I do not agree with Ms Bowbyes that there is an undesirable complexity within the current rules that differentiate between Flat and Sloping Sites. I am not aware of any problematic issues arising over the last 20 years of working within the resource consent process in the district. The process for determination of flat and sloping sites is well engrained and understood in the resource management profession.
12. I do not agree with Ms Bowbyes that this issue of recession planes limiting development is 'discrete'¹ in the Queenstown context. As set out in my evidence I identify that a significant proportion of the LDSRZ land in Queenstown is sloping,² with many south facing sites.
13. I also do not agree that retaining the existing PDP framework which excludes Sloping Sites from the application of recession planes is a 'significant change' as suggested by Ms Bowbyes. Rather this is simply reverting to the existing status quo, as an alternative to a proposed change that would limit development capacity. I do not identify any undesirable amenity outcomes that have resulted from the current standards.
14. The **JWS** also recommends the associated re-insertion of the exemption for accessory buildings in relation to recession planes for sloping sites, which is currently worded incorrectly in the PDP.

Recession Planes in the Medium Density Suburban Residential Zone (MDRZ)

15. I consider that the application of a 60° recession plane commencing at 4m on all boundaries including the southern boundary is an appropriate

¹ Rebuttal Evidence, Section 42A Report of Amy Bowbyes dated 25 July 2025 at 7.5-7.8

² Queenstown Hill, Fernhil, Kelvin Heights, Arthurs Point, Frankton Road

standard. This is because it closely aligns with the built form currently permitted under the PDP (a form of 7m at 1.5m off the boundary) when considering amenity impacts, but allows for greater development capacity on sloping sites (compared to the proposed 35° plane).

16. Ms Frischknecht is critical of the example provided within my primary evidence as being a very sloping site (35°), however as explained in my evidence, I find that even on a slope of 6° the 35 degree recession plane has a limiting effect (which only increases as the slope of the site increases) neutralising the buildable envelope. I have provided a general diagram in **Annexure A** to provide further illustration of this point.
17. I remain of the view that the application of a 4m + 60° recession plane applied to the southern boundary of sloping sites in the MDRZ would be appropriate in urban design terms as outlined in the **JWS**.

Queenstown Town Centre Zone Provisions

18. I retain a view that a breach of the Building Façade Height rule (12.5.8) should be assessed with respect to design in relation to the public realm, and that a non-notification rule and the removal of matter of discretion (d) would be appropriate.
19. I support the recommendations of Council officers with respect to the properties at 12-26 and 10 Man Street with regard to a fixed datum for measurement of building height (12.5.9). I consider that adjustments to Rule 12.5.8 (Building Façade Height) would be useful with respect to these properties (Precincts 3-A and 3-B) to facilitate the intent of the rule - being a consistent streetfront façade experience for users of the public realm.



Paula Marie Costello

6 August 2025

ANNEXURE A

MDR Recesson Plane



