

Before an Independent Hearings Panel  
Appointed by Queenstown Lakes District Council

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*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:* **MacFarlane Investments Limited and J L  
Thompson (MIL)**  
(Submitter 767)

Statement of evidence of David Compton-Moen

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Dated: 4 July 2025

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## STATEMENT OF EVIDENCE OF DAVE COMPTON-MOEN

### INTRODUCTION

- 1 My name is David John Compton-Moen.
- 2 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University. I have been a Registered Landscape Architect of the New Zealand Institute of Landscape Architects ('NZILA') since 2001, a full member of the New Zealand Planning Institute, since 2007, and a member of the Urban Design Forum since 2012.
- 3 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 4 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong. During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
  - 4.1 2024 – Queenstown Hotel Fast Track Application. I was involved in expert conferencing on behalf of an affected party assessing the urban design effects of a proposed hotel on Man St above the existing Man St Carpark. The building sought relief for setbacks, building height and the location of View shaft.
  - 4.2 2019-2021 - Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones. Working with QLDC staff and Vivian Espie, I was tasked with preparing Design Guides for Residential and Business Mixed Use Zones.
  - 4.3 2022- current – Te Pa Tahuna Super Lot 01. I have been working with Mike Greer Commercial and Ngai Tahu on the development of 3 apartment buildings on the old school site.
  - 4.4 2015-2020 Future Plan – Intensification of Residential Areas, Medium Density Design Guide and Plan Change 43, Hutt City Council. I worked with Council staff to develop provisions and design guides for intensification of Residential and Suburban Commercial centres in Hutt City.
  - 4.5 2020 – Working with Hastings District Council and Stantec, a design guide was prepared for Intensification of Residential Areas within Hastings District.
  - 4.6 2024 – Working for Carter Group to provide Urban Design and Landscape advice for Environment Court mediation for West Rolleston (previously PC73, 81 and 82) which includes provision for approximately 3,500 new dwellings and 4 commercial centres of varying sizes. Each centre was modelled to test how each one could be developed to provide for future residents' day-to-day needs.

- 4.7 2020- current – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for several Medium Density Residential and Mixed-Use Developments: Madras Square (+90 homes); 476 Madras Street (98 homes); 258 Armagh Street (33 homes); and 33 Harewood Road (31-homes).
- 4.8 2017-current - Acland Park, Rolleston – master planning and landscape design for a 1,000-lot development in Rolleston. This development is almost completely built out with only the small commercial centre to be built.
- 4.9 2022- current - Harrow Green, Rolleston – provision of urban design advice for a residential development for 266 dwellings against the proposed MDRS rules. Our office is currently working on the landscape design of this subdivision.
- 5 I am familiar with MIL’s submission on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and its interests in the block of land bound by Man Street, Brecon Street, Isle Street and Camp Street (*MIL Land*).<sup>1</sup>

### **CODE OF CONDUCT**

- 6 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

- 7 The purpose of my evidence is to set out my involvement in the preparing of evidence to support these rezoning requests. My evidence should be read in conjunction with the Graphic Attachment attached as Appendix 1.
- 8 My evidence will deal with the following:
- 8.1 Methodology for Modelling and Proposed Submission Heights;
  - 8.2 Anticipated, including Consented, Receiving Environment;
  - 8.3 Extent of Town Centre based on Built Form;
  - 8.4 Building Setback for Upper Floors and Shading Issues;
  - 8.5 Built Form and Amphitheatre around the Waterfront;
  - 8.6 Building Dominance from Increasing the Man-Brecon-Isle-Camp Block; and
- 9 In preparing my evidence, I have reviewed:

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<sup>1</sup> MIL has an interest in land at 2, 4 and 8 Isle Street, 19 Brecon Street and 5, 7 and 11 Man Street.

- 9.1 The UIV Section 42A (Town Centres and Business Zones) report prepared by Corinne Frischknecht, 6 June 2025;
- 9.2 UIV Statement of Evidence (Urban Design) by Cam Wallace, 6 June 2025; and
- 9.3 Strategic Evidence Appendix 2 – Summary of submissions and decisions.

### **METHODOLOGY FOR MODELLING**

- 10 To assist with determining and testing effects of the proposed submissions, our office has imported LIDAR information, including current buildings and vegetation in Sketchup. We have then overlaid the proposed 'Bulk Forms' proposed under the UIV, including the increased height at 12-26 Man St over the carpark, to gain a better understanding of the spatial implications of the proposed increases.
- 11 We have also modelled several Submission proposals which seek greater Intensification and Consented developments including the following (refer to Figures 1 and 3 in the Graphic Attachment):
  - 11.1 Crowne Plaza seeking 24m from the current ODP limit of 7m;
  - 11.2 Centuria Site seeking 24m from a currently consented 18m;
  - 11.3 Novotel Hotel seeking 24m from the proposed UIA limit of 20m;
  - 11.4 The Block of land bound by Man Street, Brecon Street, Isle Street and Camp Street seeking 24m from the current ODP limit of 12+2m;
  - 11.5 34 Brecon Street is consented to be 23m;
  - 11.6 12-26 Man St is consented to be 23.78m above the carpark (refer to Figure 2 in the Graphic Attachment).
- 12 A series of images have been prepared from an elevated location above the lake and then from water level. The intention of this is to highlight the 'amphitheatre' nature of the town centre and how buildings typically step-up the slopes around the Lakefront (refer to Figures 5-12 in the Graphic Attachment).
- 13 A photo-illustration has been created for the proposed view looking back at the site from Lake Esplanade.

### **ANTICIPATED, INCLUDING CONSENTED, RECEIVING ENVIRONMENT**

- 14 From looking at a combination of the UIV provisions and the consented receiving environment there is significant development occurring on the uphill side of Man Street and along Brecon Street where the current height limits are breached. This includes the following consented developments (refer to figure 1 of the Graphic Attachment):
  - 14.1 Lakeview with buildings up to 42m;
  - 14.2 34 Brecon Street at 23m;
  - 14.3 Centuria Hotel (17-19 Man St) at 18m; and

14.4 21-23 Man St at 15.5m.

- 15 Immediately to the west of the Lake Street 'Block', bordered by Lake, Man, Brunswick Streets and Lake Esplanade, the High Density zone has a maximum height limit of 16.5m.
- 16 When combined with the UIV heights, the PC50 sites are noticeable for their lack of potential built form. From a built form perspective bringing these sites up to 24m in height, with an Upper Floor setback, would allow for greater Intensification without creating adverse effects on adjoining properties. It would also recognise the consented developments which already exceed the current height standards.

#### **EXTENT OF TOWN CENTRE BASED ON BUILT FORM**

- 17 For the most part the Extent of the Town Centre covered by the UIV makes sense spatially, either defined by major roads or topography in the case of the Novotel site (refer to Figure 4 of the Graphic Attachment). However, the exclusion of the PC50 area makes no sense in spatial terms. The blocks within this area are well connected and highly accessible. For the most part they are developing into areas characterised by commercial and visitor accommodation as opposed to individual residential houses which used to cover the majority of the area.
- 18 The area north of Man St, including the Lake View development, is quickly transitioning from pure residential to being similar in character to the Town Centre. It is physically constrained to the northwest by topography and by Open Space and High Density Residential to the northeast
- 19 The Thompson 'Block' is located on the corner of Man and Brecon Streets, being immediately across the road the Brecon Road steps which descend directly into the town centre proper and adjacent to the Queenstown Recreation Reserve. Commercial activities extend all the way along Brecon Street to the north up the Skyline gondola terminal, noting that the block bounded by Brecon and Isle Street has been included in the UIV Town Centre. The site is part of the Isle Street Sub-zone which was described in PC50 as being:
- 19.1 *'Two blocks immediately adjacent to the current zone boundary and situated between the Queenstown Town Centre Zone and the Commercial overlay area on Brecon Street have been identified as suitable for the expansion of the Queenstown Town Centre Zone. Activities envisaged for this area would see the continuation of visitor accommodation, small scale commercial / administration and retail activities and residential uses. For these two blocks, a commercial mixed-use environment is sought for this area. In order to provide for this mixed use environment, we propose to include a new sub-zone in the District Plan. This sub-zone, to be called the Isle Street sub-zone will involve a new policy and new rules in the District Plan to manage the scale of buildings, promote an interesting pedestrian environment and limit retail activities in order to avoid large format retail from establishing here.'*<sup>2</sup>
- 20 In general PC50's intention was to increase development potential:

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<sup>2</sup> QLDC PC50 – Appendix F – Consultation Material

20.1 *'While these initiatives involve rezoning land from High Density Residential to a Town Centre zoning, the proposed plan change will allow for greater development rights as well as providing for residential land use. Therefore potential residential development yield from the land will not be diminished, and may in fact be increased.'*

- 21 I consider that these areas along with the Lake View site should be incorporated into the Town Centre extent recognising the current and future built form of this area, noting that the intention of PC50 was to extend the Town Centre zone to incorporate this land.

#### **BUILT FORM AND AMPHITHEATRE AROUND THE WATERFRONT**

- 22 When viewing the existing contours and built form around the lakefront, there is a notable terracing of development up the hill to create an 'amphitheatre' like appearance, and buildings stepping down to the Lakefront. The proposed increase of development potential at 12-26 Man Street 'breaks' this rule with the southern side of the proposed building sitting well above and extending forward of the sites to either side.
- 23 To continue this 'amphitheatre' like character, increasing the development height on the northside of Man St (including the Man-Brecon-Isle-Camp Block) to 24m would make sense and allow the top floors to be seen above the proposed Queenstown Hotel.

#### **BUILDING SETBACKS AT UPPER FLOORS AND SHADING ISSUES**

- 24 The proposed upper floor building setbacks of 3m for buildings between 12m and 16m, and 6m setback above 16m on road frontages is considered a positive design aspect as it will assist with bringing sunlight into public spaces and streets. The setback ensures that steep vertical walls do not occur immediately on the street edge which would potentially sunlight and visual dominance issues.
- 25 The implementation of this setback on the Man-Brecon-Isle-Camp Block would ensure that any potential shading issues on Man Street would be mitigated.

#### **BUILDING DOMINANCE FROM INCREASING THE HEIGHT OF THE MAN-BRECON-ISLE-CAMP BLOCK**

- 26 For the Man-Brecon-Isle-Camp Block, increasing the height in this location will bring the sites 'in-line' or consistent with the buildings on the southern side of Man Street. At present the 12m +2m for roof form height limit is significantly lower than the southern side of Man Street immediately opposite where the height limit under the UIV is proposed to be 24m. This is evident in the cross section prepared (refer to Figure 2 in the Graphic Attachment) prepared for further along Man Street where a Fast Track Proposal is sought in the 20m height limit precinct.

#### **CONCLUSIONS**

- 27 In reviewing the proposed UIV provisions and modelling of the Town Centre, I am of the opinion that:

- 27.1 The PC50 area, including the Man-Brecon-Isle-Camp block should be incorporated into the Town Centre extent recognising the current and future built form of this area;
- 27.2 The implementation of this setback on the block would ensure that any potential shading issues;
- 27.3 Increasing the height limit will provide additional capacity for intensification.

Dated: 4 July 2025

Dave Compton-Moen

**Appendix 1 – Graphic Attachment**



## **URBAN INTENSIFICATION VARIATION - SUBMITTER 767**

URBAN DESIGN GRAPHIC SUPPLEMENT

**FOR MACFARLANE INVESTMENTS LIMITED AND J L THOMPSON (MIL)**  
PROJECT NO. 2023\_162 | 04 JULY 2025 | REVISION A

### URBAN INTENSIFICATION VARIATION - SUBMITTER 767

Project no: 2023\_162  
Document title: URBAN DESIGN GRAPHIC SUPPLEMENT  
Revision: A  
Date: 04 JULY 2025  
Client name: FOR MACFARLANE INVESTMENTS LIMITED AND J L THOMPSON (MIL)

Author: Dave Compton-Moen, Zoe Hughes  
File name: 2023\_162\_QLDC\_MacFarlane Investments Thompson\_A

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B	04/07/2025	EVIDENCE	ZH	DCM	DCM

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**LEGEND**

VARIATION PRECINCT HEIGHTS

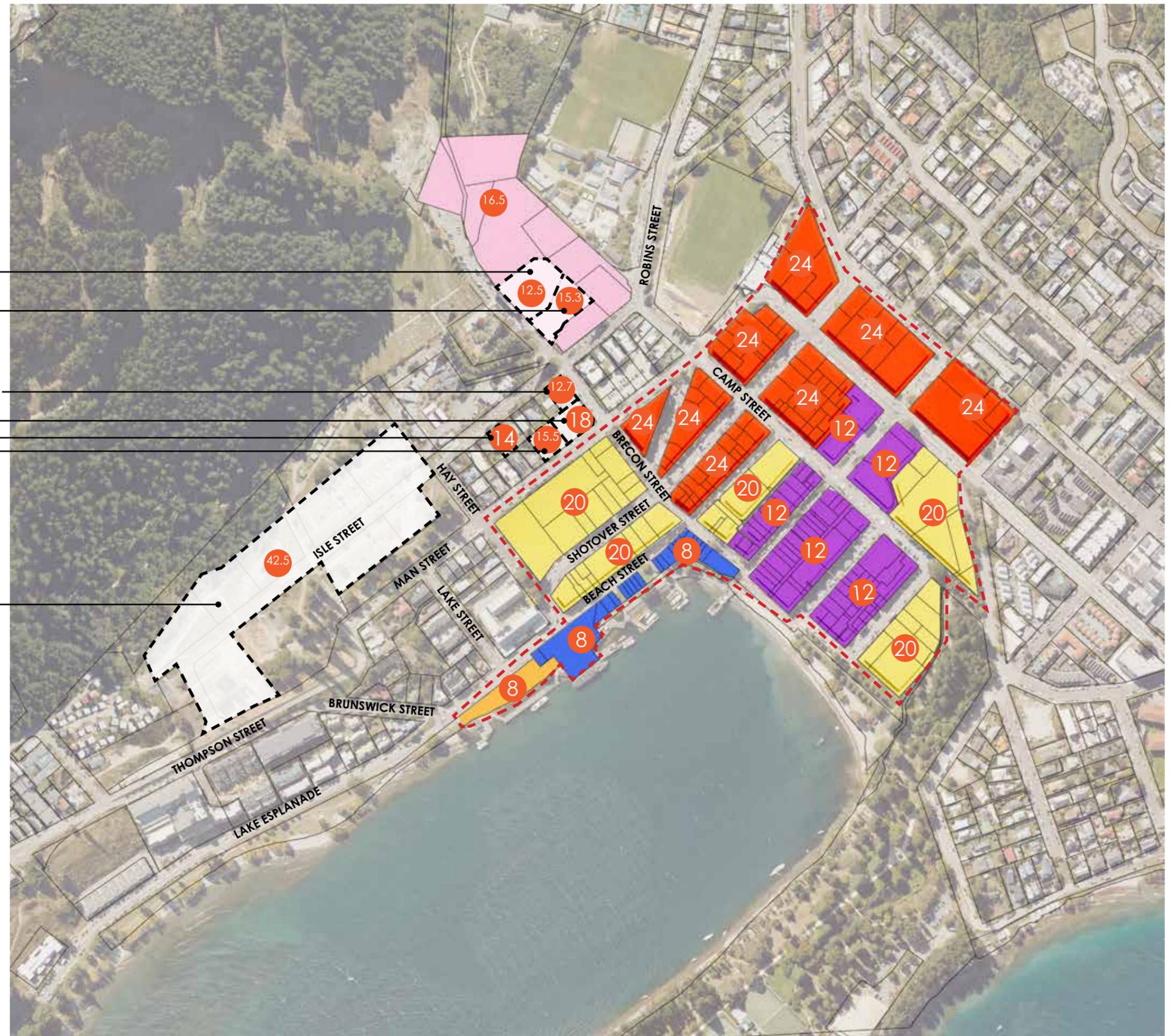
- Precinct 1      8m (total height)
- Precinct 2      8m (12m total height)
- Precinct 3      12m (20m total height)
- Precinct 4      12m (24m total height)
- Precinct 5      16.5m (total height)
- Precinct 6      8m (total height)

CONSENTED DEVELOPMENT HEIGHTS

- 35 Brecon Street      12.5m
- 22-24 Brecon Street      12.7m
- 22 Isle Street      14m
- 27 Brecon Street      15.3m
- 21-23 Man Street      15.5m
- 17-19 Man Street Centuria      18m
- 57-65 Isle Street Lakeview      42.5m

CURRENT TOWN CENTRE EXTENT UNDER URBAN INTENSIFICATION VARIATION

- 35 Brecon St
- 27 Brecon St
- 22-24 Brecon St
- 17-19 Man St
- 22 Isle St
- 21-23 Man St
- 57-65 Isle St Lakeview



PLAN VIEW - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS (SCALE 1:5000@A3)

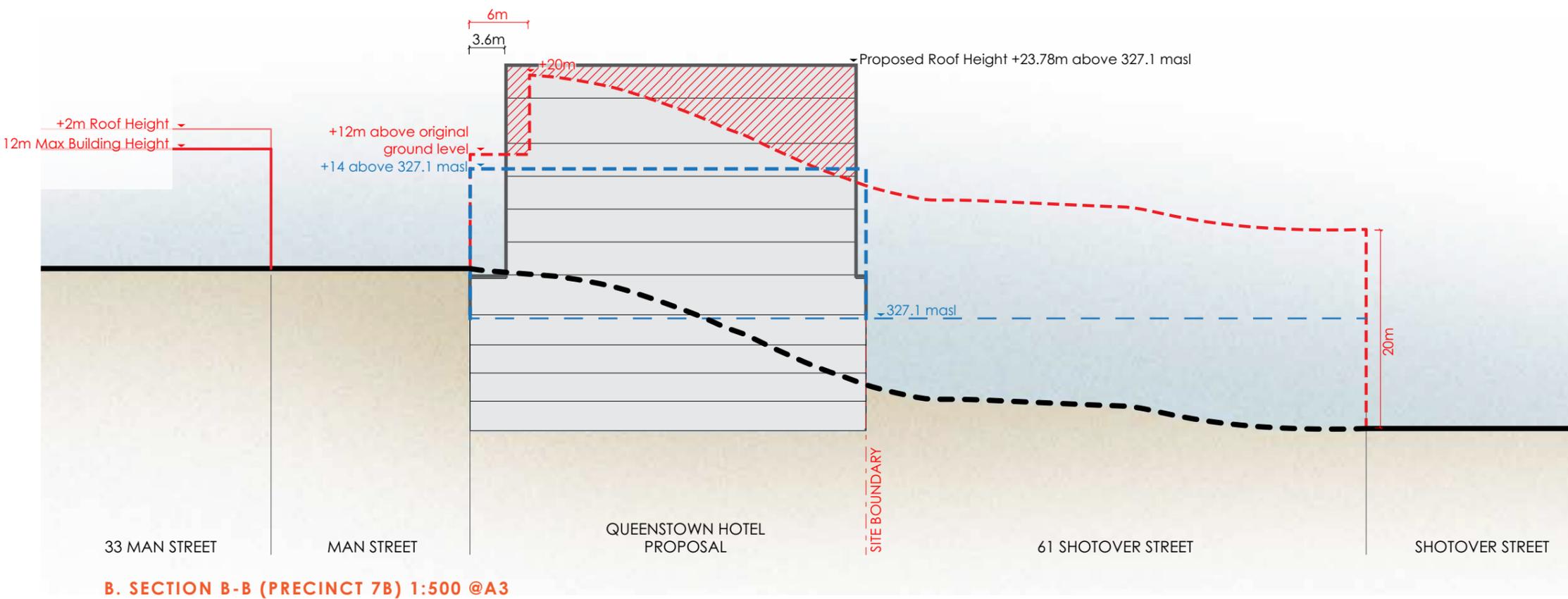
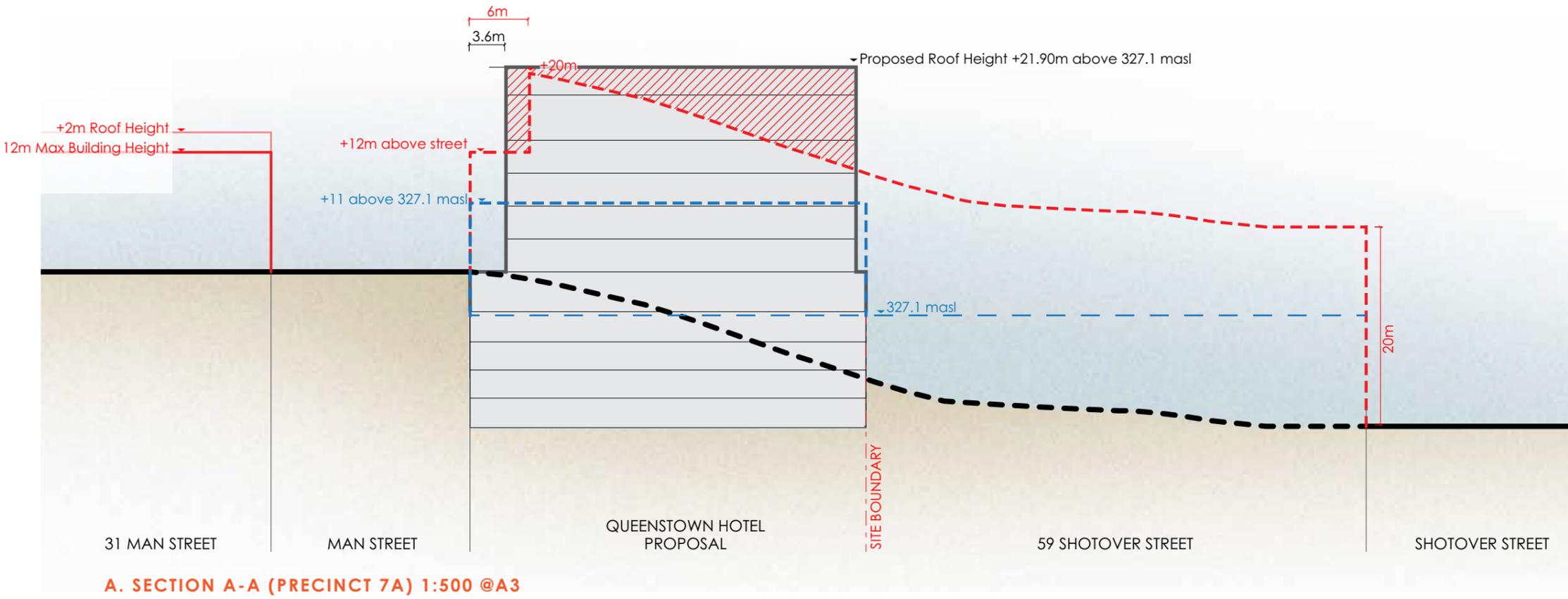
IMAGE SOURCE: LINZ DATA SERVICE 2025

# PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

## LEGEND

- Original Ground Level (source: QLDC GIS: Contours Wakatipu 1m 2021)
- PDP (+11m above 327.1m masl)
- Proposed Plan Variation (Height Precinct 3)
- Queenstown Hotel Proposal
- Area of Breach



- Height Precinct 7A (RL 327.1 masl +11)
- Height Precinct 7B (RL 327.1 masl +14)
- Height Precinct 7C (RL 327.1 masl +0)
- Height Precinct 7D (RL 327.6 masl +3)
- Section A-A
- Section B-B

**C. LOCATION MAP 1:5000@A3**

# FAST TRACK APPLICATION - QUEENSTOWN HOTEL (12-26 MAN STREET)

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

**LEGEND**

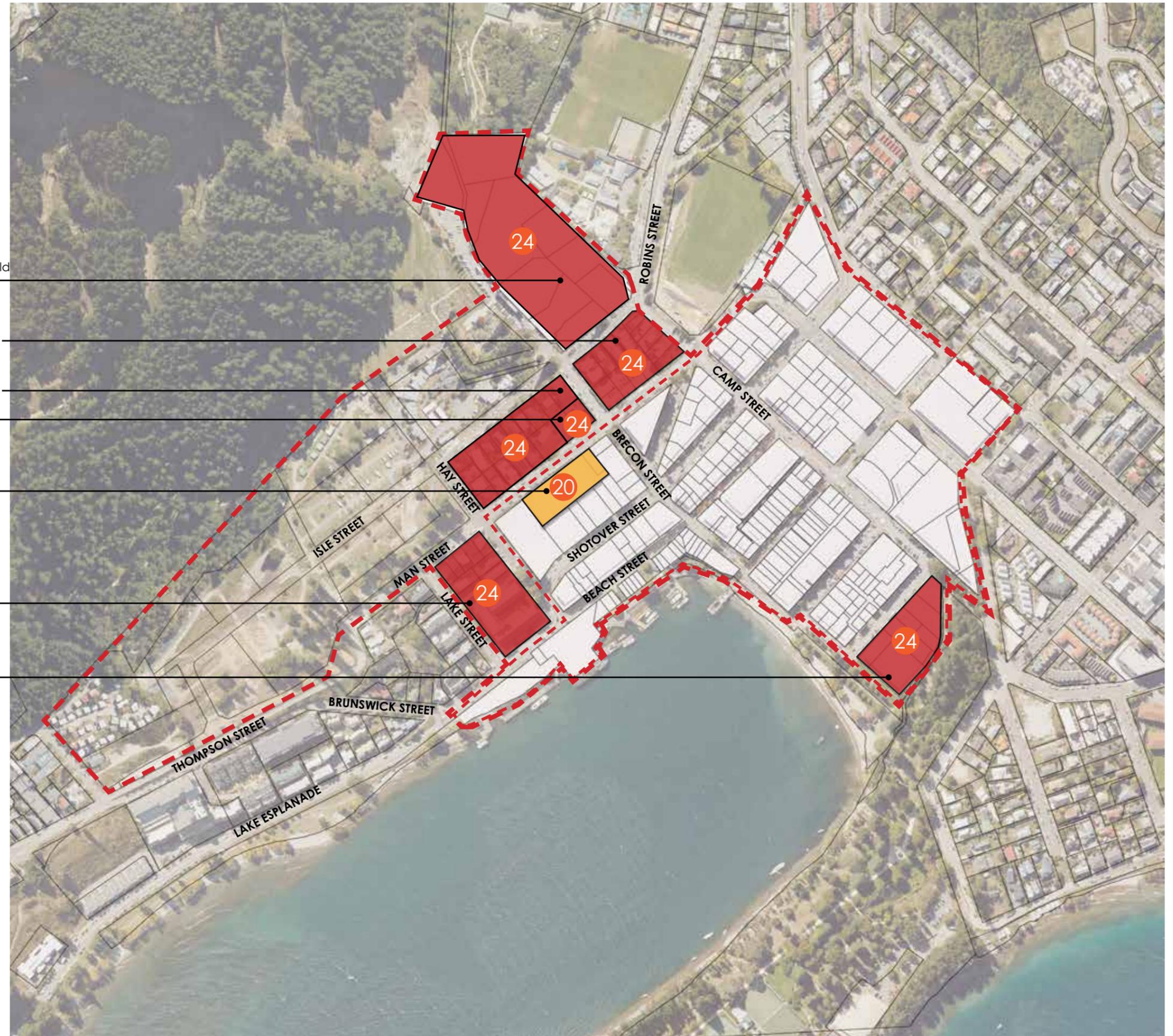
SUBMISSION HEIGHTS

- Crowne Plaza Hotel Block 24m
- Novotel Hotel 24m
- 17-19 Man Street Centuria 24m
- OS767, OS1252 24m
- Queenstown Hotel 20m (from existing carpark height)
- Queenstown Gold Limited 24m

 CURRENT TOWN CENTRE EXTENT UNDER URBAN INTENSIFICATION VARIATION

 SUGGESTED TOWN CENTRE EXTENT BASED ON BUILT FORM BOTH ANTICIPATED AND CONSENTED

- Queenstown Gold Limited OS765
- OS767
- OS1252
- 17-19 Man St OS743
- Queenstown Hotel OS991
- Crowne Plaza OS776
- Novotel OS771



**PLAN VIEW - PROPOSED SUBMISSION HEIGHT LIMITS (SCALE 1:5000@A3)**  
 IMAGE SOURCE: LINZ DATA SERVICE 2025

**PROPOSED SUBMISSION HEIGHT LIMITS**

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT



**LEGEND**

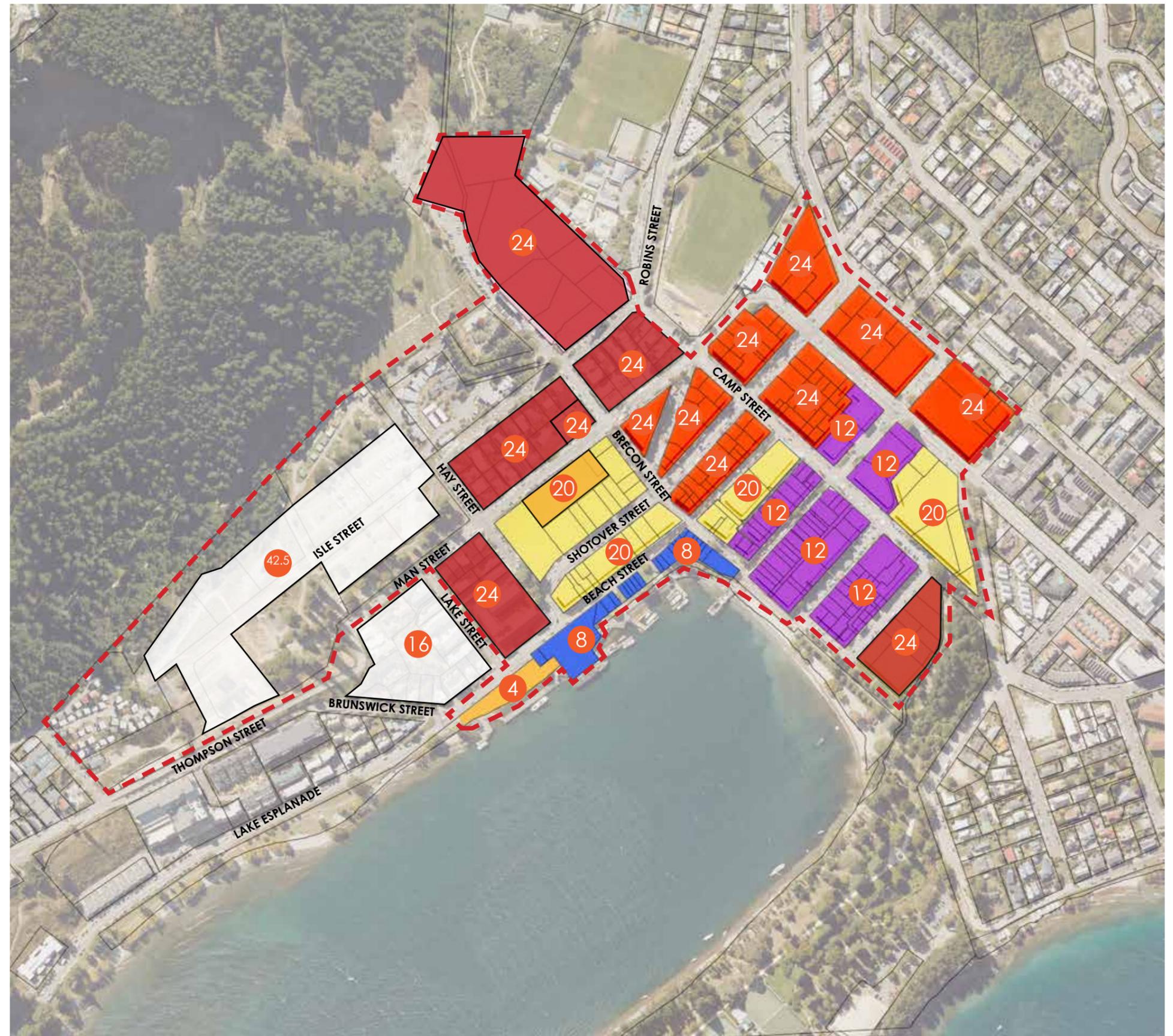
VARIATION PRECINCT HEIGHTS

<span style="color: blue;">■</span> Precinct 1	8m (total height)
<span style="color: purple;">■</span> Precinct 2	8m (12m total height)
<span style="color: yellow;">■</span> Precinct 3	12m (20m total height)
<span style="color: orange;">■</span> Precinct 4	12m (24m total height)
<span style="color: pink;">■</span> Precinct 5	24m (total height)
<span style="color: gold;">■</span> Precinct 6	4m (total height)

SUBMISSION HEIGHTS

Crowne Plaza Hotel Block	24m
Novotel Hotel	24m
17-19 Man Street Centuria	24m
PC50	24m
Queenstown Hotel	20m (from existing carpark height)

⬜ TOWN CENTRE EXTENT BASED ON BUILT FORM BOTH ANTICIPATED AND CONSENTED



PLAN VIEW - PROPOSED AND SUBMISSION HEIGHT LIMITS (SCALE 1:5000@A3)

IMAGE SOURCE: LINZ DATA SERVICE 2025

PROPOSED AND SUBMISSION HEIGHT LIMITS COMBINED

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT



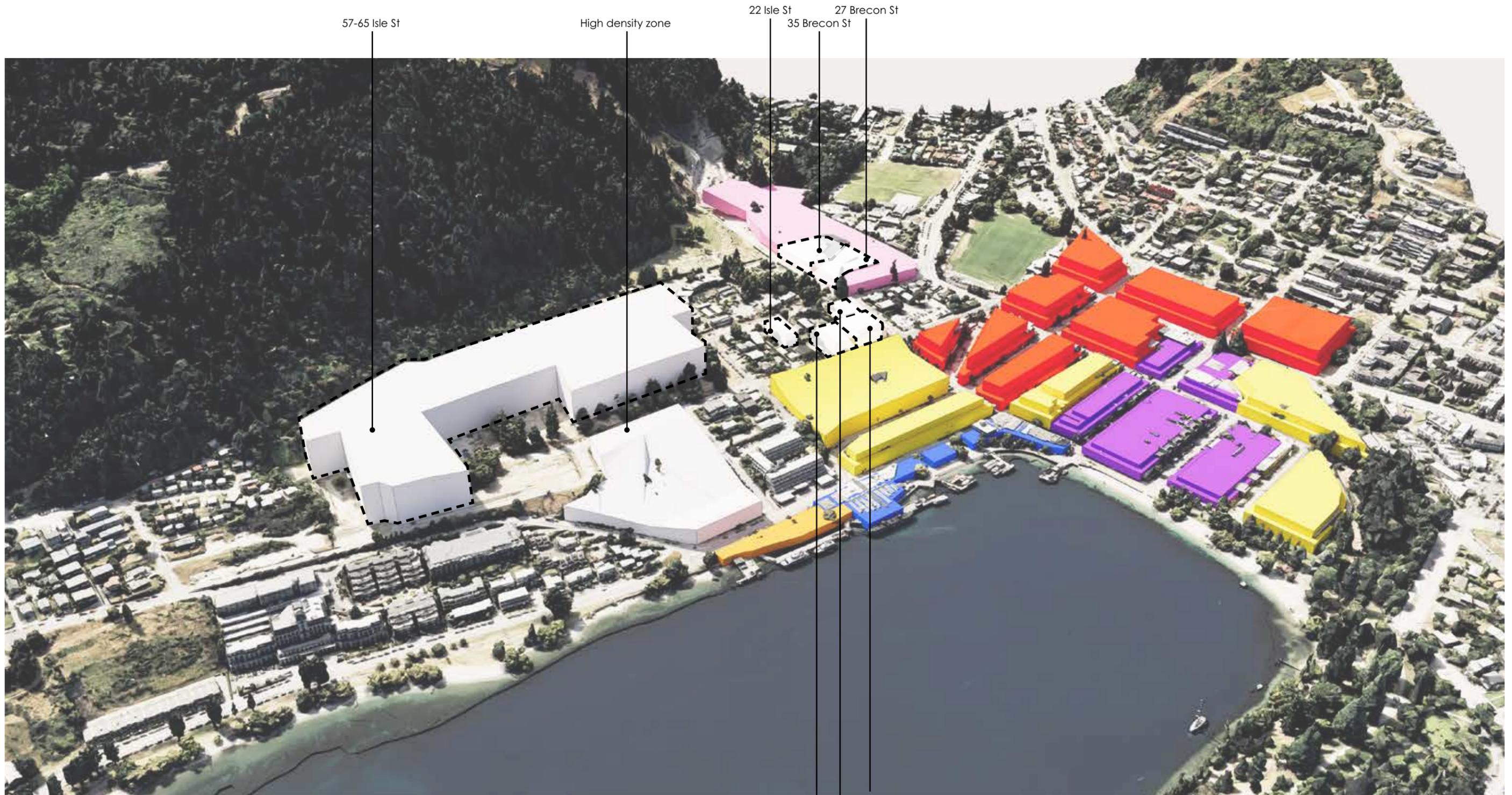
**A. ELEVATED PERSPECTIVE - EXISTING VIEW**

IMAGE SOURCE: GOOGLE EARTH 2025

## ELEVATED PERSPECTIVE - EXISTING VIEW

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023\_162\_QLDC\_MacFarlane Investments Thompson\_A



**A. ELEVATED PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS**  
 IMAGE SOURCE: GOOGLE EARTH 2025

17-19 Man St  
 21-23 Man St  
 22-24 Brecon St

**LEGEND**

<span style="color: blue;">■</span> Precinct 1	8m (total height)	<span style="color: orange;">■</span> Precinct 6	8m (total height)	<span style="border: 1px dashed black; padding: 2px;"> </span> 27 Brecon Street	15.3m
<span style="color: purple;">■</span> Precinct 2	8m (12m total height)	<span style="border: 1px dashed black; padding: 2px;"> </span> 35 Brecon Street	12.56m	<span style="border: 1px dashed black; padding: 2px;"> </span> 21-23 Man Street	15.5m
<span style="color: yellow;">■</span> Precinct 3	12m (20m total height)	<span style="border: 1px dashed black; padding: 2px;"> </span> 22-24 Brecon Street	12.7m	<span style="border: 1px dashed black; padding: 2px;"> </span> 17-19 Man Street	18m
<span style="color: red;">■</span> Precinct 4	12m (24m total height)	<span style="border: 1px dashed black; padding: 2px;"> </span> 22 Isle Street	14m	<span style="border: 1px dashed black; padding: 2px;"> </span> 57-65 Isle Street	42.5m
<span style="color: pink;">■</span> Precinct 5	16.5m (total height)				

## ELEVATED PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT



**A. ELEVATED PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS**

IMAGE SOURCE: GOOGLE EARTH 2025

Queenstown Gold Limited OS765 OS1252 OS767  
 Crowne Plaza OS776 Queenstown Hotel OS991 Novotel OS771

**LEGEND**

<span style="display: inline-block; width: 15px; height: 10px; background-color: #c00000; border: 1px solid black;"></span> Crowne Plaza	24m	<span style="display: inline-block; width: 15px; height: 10px; background-color: #ffc000; border: 1px solid black;"></span> Queenstown Hotel	20m (from existing carpark height)
<span style="display: inline-block; width: 15px; height: 10px; background-color: #c00000; border: 1px solid black;"></span> Novotel	24m	<span style="display: inline-block; width: 15px; height: 10px; background-color: #c00000; border: 1px solid black;"></span> Queenstown Gold Limited	24m
<span style="display: inline-block; width: 15px; height: 10px; background-color: #c00000; border: 1px solid black;"></span> 17-19 Man Street	24m		
<span style="display: inline-block; width: 15px; height: 10px; background-color: #c00000; border: 1px solid black;"></span> PC50	24m		

**ELEVATED PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS**

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

High density zone



**A. ELEVATED PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS**

IMAGE SOURCE: GOOGLE EARTH 2025

**LEGEND**

<span style="color: blue;">■</span> Precinct 1	8m (total height)	<span style="color: orange;">■</span> Precinct 6	4m (total height)	<span style="color: red;">■</span> 34 Brecon Street	27.7m
<span style="color: purple;">■</span> Precinct 2	8m (12m total height)	<span style="color: red;">■</span> Crowne Plaza Hotel Block	24m	<span style="color: red;">■</span> PC50	24m
<span style="color: yellow;">■</span> Precinct 3	12m (20m total height)	<span style="color: red;">■</span> Novotel Hotel	24m	<span style="color: orange;">■</span> Queenstown Hotel	20m (from existing carpark height)
<span style="color: red;">■</span> Precinct 4	12m (24m total height)	<span style="color: red;">■</span> 17-19 Man Street Centuria	24m	<span style="color: red;">■</span> Queenstown Gold Limited	24m
<span style="color: pink;">■</span> Precinct 5	24m (total height)				

**ELEVATED PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS**

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT



**A. PERSPECTIVE - EXISTING VIEW**

IMAGE SOURCE: GOOGLE EARTH 2025

## PERSPECTIVE - EXISTING VIEW

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023\_162\_QLDC\_MacFarlane Investments Thompson\_A

57-65 Isle Street, Lakeview



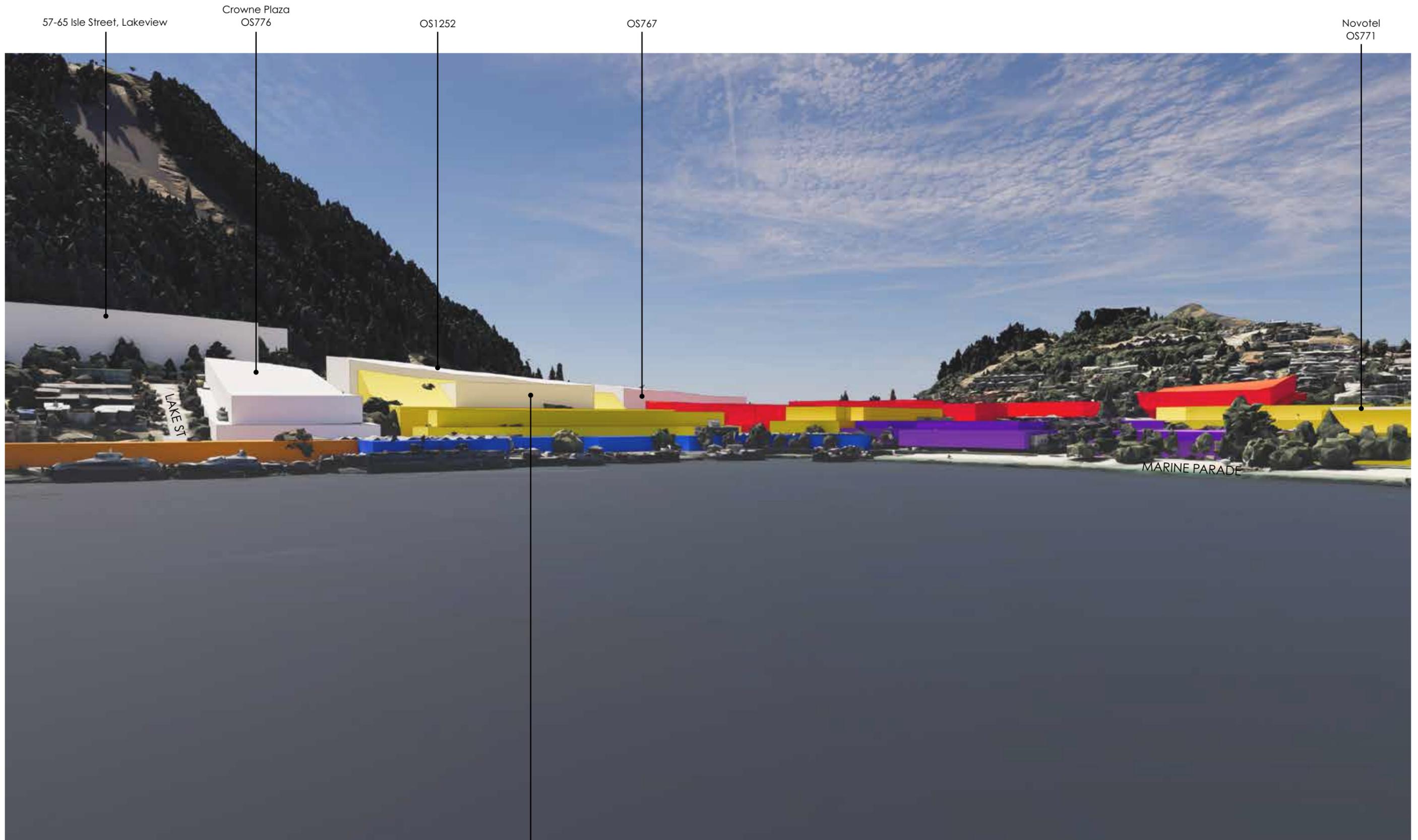
**A. PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED BUILDING HEIGHTS**

IMAGE SOURCE: GOOGLE EARTH 2025

## PERSPECTIVE - PROPOSED VARIATION HEIGHT LIMITS AND CONSENTED HEIGHT LIMITS

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT

2023\_162\_QLDC\_MacFarlane Investments Thompson\_A



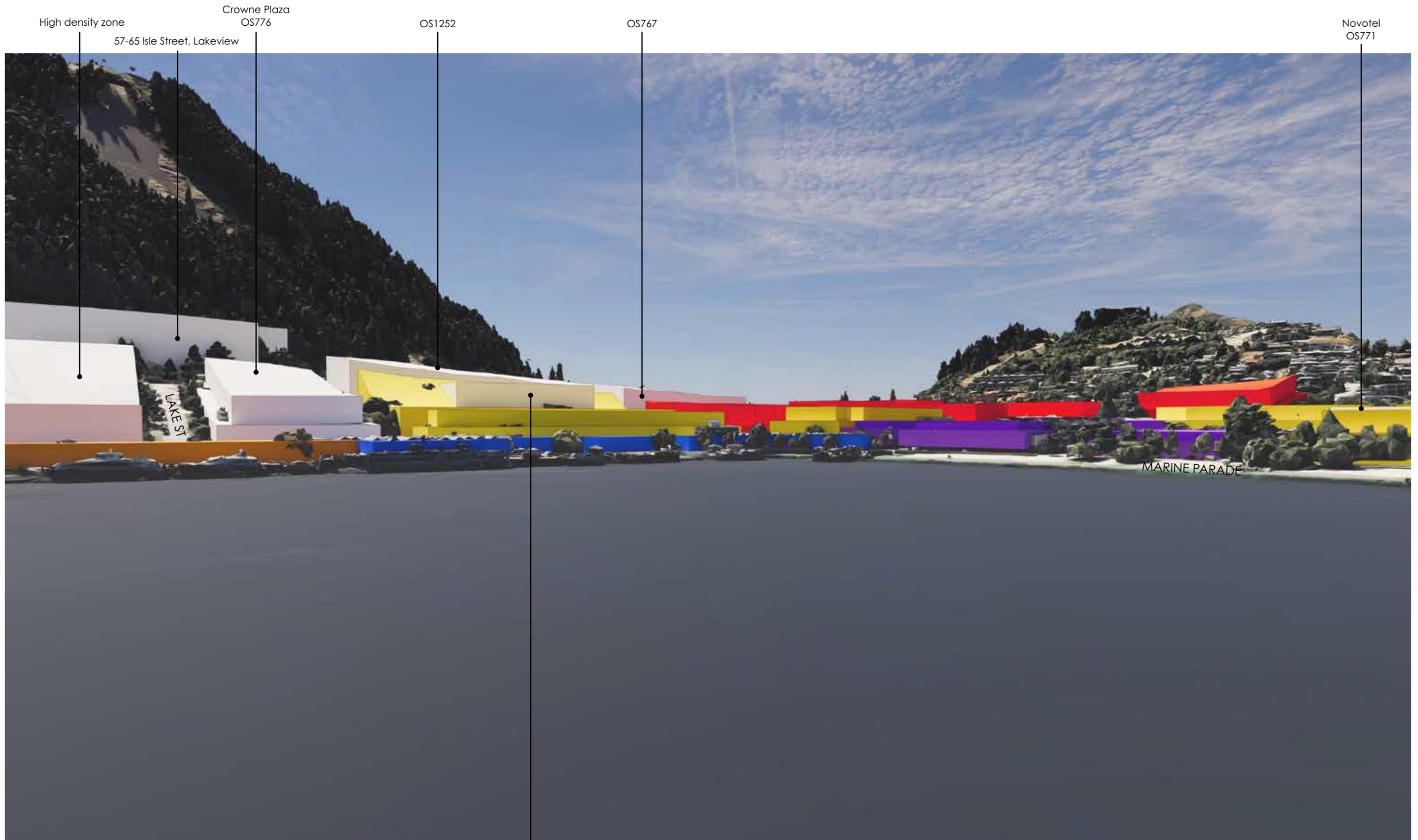
**A. PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS**

IMAGE SOURCE: GOOGLE EARTH 2025

Queenstown Hotel  
OS991

**PERSPECTIVE - PROPOSED SUBMISSION HEIGHT LIMITS**

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT



**A. PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS**

IMAGE SOURCE: GOOGLE EARTH 2025

**PERSPECTIVE - PROPOSED AND SUBMISSION HEIGHT LIMITS**

URBAN INTENSIFICATION VARIATION (SUBMITTER 767) - URBAN DESIGN GRAPHIC SUPPLEMENT