

SUMMARY OF EVIDENCE

- A. This planning evidence is provided on behalf of Reid Investment Trust (**'Reid Trust'**), in relation to the Queenstown Urban Intensification Variation (**'UIV'**) initiated by Queenstown Lakes District Council (the **'Council'**), with regard to the intensification of the Queenstown Town Centre. Reid Trust is a submitter on the UIV, and are the owners of the site at 11-15 Rees Street, which is directly affected by the proposed UIV.

- B. My evidence addresses the inclusion of 11-15, 17, and 19 Rees St within Height Precinct 3 (increasing maximum building height from 12m to 20m), and the building height setback standard as it applies to laneways.

- C. Overall, it is my opinion that the Height Precinct 3 boundary should be modified to incorporate the site and 11-15, 17, and 19 Rees St, and that the building height setback standard be amended to exclude laneways.

1. INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

- 1.1 My full name is Jason Karlos Ashby.
- 1.2 I have a Master of Science Degree in Spatial Planning from University College London (Bartlett School of Planning). I have approximately 10 years' experience as a planner.
- 1.3 I am currently employed at Planning Focus as a planner. I have held this position for approximately two years. Prior to this, I have held various planning roles in London, England and Auckland, New Zealand. From July 2014 until April 2018 I was employed as a Planning Officer by the Royal Borough of Kingston upon Thames (London, England). From April 2018 Until February 2020. I was employed as a Senior Planner Planning Policy within Richmond, and Wandsworth Councils (London, England). From February 2020 until July 2023 I was employed as a Senior Planner at Auckland Transport. I am an intermediate member of the New Zealand Planning Institute.
- 1.4 I have familiarised myself with the subject environment through aerial imagery, site photos, and Google Street view. I have also visited the location while on holiday.

2. CODE OF CONDUCT

- 2.1 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) ('**Code**') and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the Independent Hearing Commissioners. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

3. SCOPE OF EVIDENCE

- 3.1 This statement of evidence covers the following:
- (a) Reid Trust land holdings;
 - (b) The Urban Intensification Variation;
 - (c) Assessment of effects;
 - (d) Comments on section 42A report and supporting Council evidence;
 - (e) Conclusion.

3.2 My evidence briefly covers the background and descriptive matters that have been well traversed in the s42A report and in the extensive UIV documentation. My evidence focuses on analysis of the relief sought in the Reid Trust submission.

4. REID TRUST'S LAND HOLDING

4.1 Reid Trust's land holding is located at 11-15 Rees Street Queenstown ('the **Site**'), and is highlighted in yellow in Figure 1 below. Under the Queenstown Lakes Proposed District Plan ('QLPDP') the Site is located within the Queenstown Town Centre zone and is overlaid by the Queenstown Town Centre Special Character Area. The location of the Site is shown in yellow in Figure 1 below.



Figure 1 – Location Plan

4.2 The Site is defined by Rees Street to south and Cow Lane to the north. The Site is not located within a Heritage Precinct. The building on the Site has recently been fully renovated with new shopfront glazing.

4.3 Development proximate to the Site is characterised by mixed use buildings including buildings up to four levels in height with retail and/or commercial activities on the ground floor and, in some cases, residential, including visitor accommodation, on the upper floors.

- 4.4 The Site has high levels of pedestrian accessibility, with most of the town centre accessible within a 5 minute walk, and is located close to public transport.

5. The UIV

- 5.1 The Council notified the UIV to the QLPDP on 24 August 2023. The UIV aims to increase both commercial and residential development capacity by enabling additional height and density. The UIV is a response to the National Policy Statement on Urban Development (**'NPSUD'**) which requires councils in high-growth areas, such as Queenstown, to implement specific policies and rules related to urban development capacities.
- 5.2 Reid Trust lodged a submission on the notified UIV to the QLPDP on 5 October 2023. The submission supports the general direction of the UIV, particularly the proposed increase in building heights and the aim of enabling greater intensification within the Queenstown Town Centre. However, the submission sought amendments to the proposed height precinct boundaries to include 11–15, 17, and 19 Rees Street (the **'Subject Sites'**) as per Figure 2 below within Town Centre Height Precinct 3. The Subject Sites are strategically located, highly accessible, and not subject to heritage constraints, and I consider they are well suited to support development up to 20m in height.
- 5.3 The submission also sought that the building height setback standard should apply only to main road frontages, and not to lanes such as Cow Lane, to better reflect the urban context and give effect to the NPSUD. Overall, the relief sought was aimed at enabling more intensive, well-functioning urban development in a manner that aligns with NPSUD and ensures a logical and coherent built form transition within the town centre.

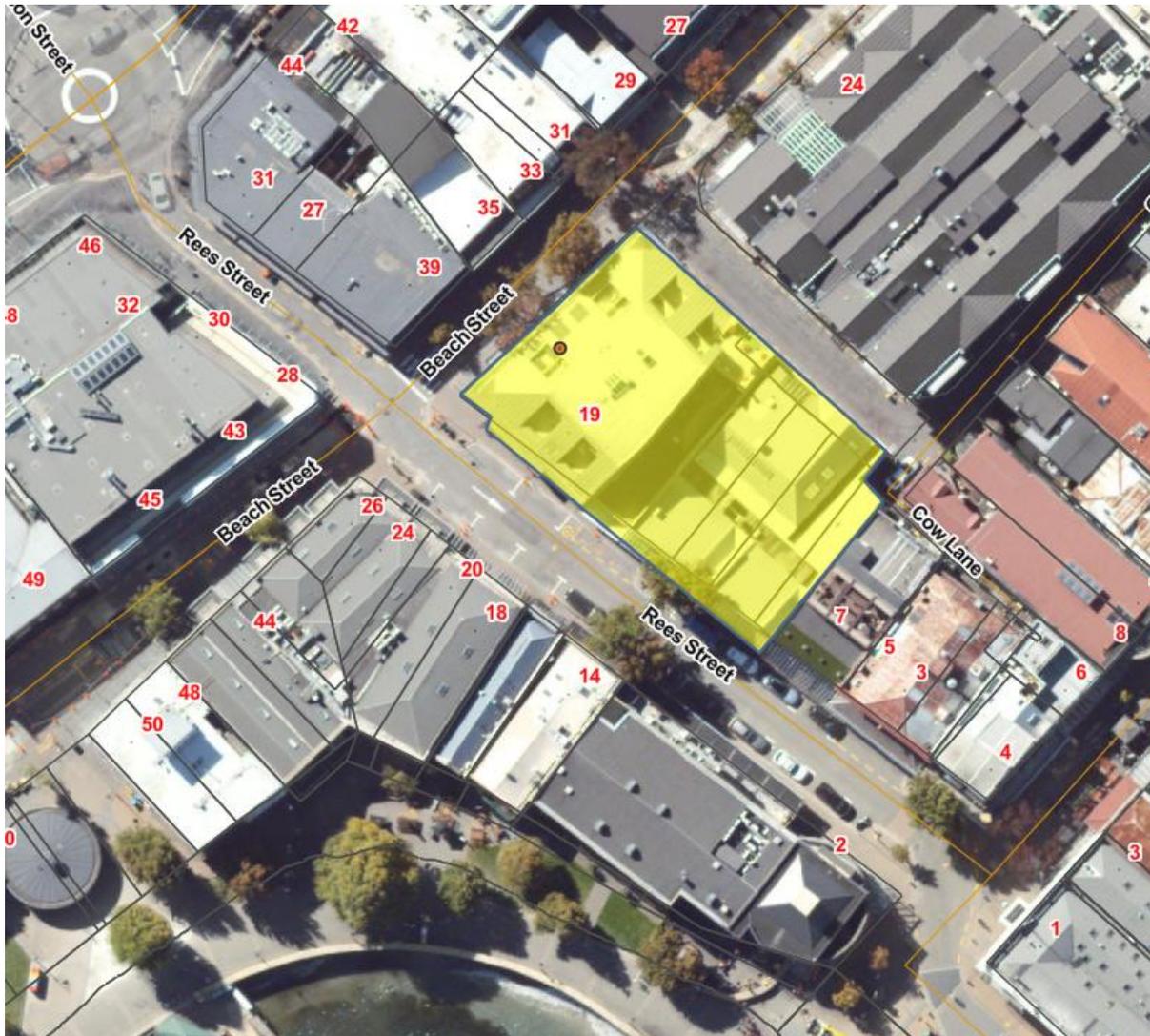


Figure 2. The Subject Sites

6. ASSESSMENT OF EFFECTS

6.1 The relief sought by the Reid Trust is as follows:

- That 11-15, 17, and 19 Rees St be included in Height Precinct 3 (increasing maximum building height from 12m to 20m), subject to any amendment required to ensure adequate sunlight access to Earnslaw Park and the Lakefront Area; and
- That the building height setback standard apply to main road frontages only, and that lanes (such as Cow Lane) be specific exclusions.

6.2 The Queenstown Town Centre zone is the district's principal centre for commercial, entertainment, cultural and visitor activity. The zone is anticipated to evolve into a high-intensity, high-quality urban environment, with the planning framework actively enabling intensification in appropriate locations. The zone purpose, objectives, and

supporting policies recognise the central role the town centre plays for residents and visitors, and the need to respond to increasing demand for both housing and business activities through well-designed development.

- 6.3 The Subject Sites are located within the Queenstown Town Centre zone and are also within the Queenstown Town Centre Special Character Area. Development in this area is required to align with the Queenstown Town Centre Design Guidelines 2023, which seek to reinforce the human scale, pedestrian amenity, and character of the built environment.
- 6.4 The UIV proposed Queenstown Town Centre provisions include a series of Height Precincts which set out differentiated height limits to manage built form outcomes. The Subject Sites currently fall within proposed Height Precinct 2, which provide for a maximum height of 12m. Neighbouring sites to the north and west, within Height Precincts 3 and 4, are enabled maximum heights of 20m and 24m respectively under the UIV. This creates an inconsistent planning outcome for the Rees Street frontage, particularly given that the Subject Sites share similar accessibility, land use context, and development potential.

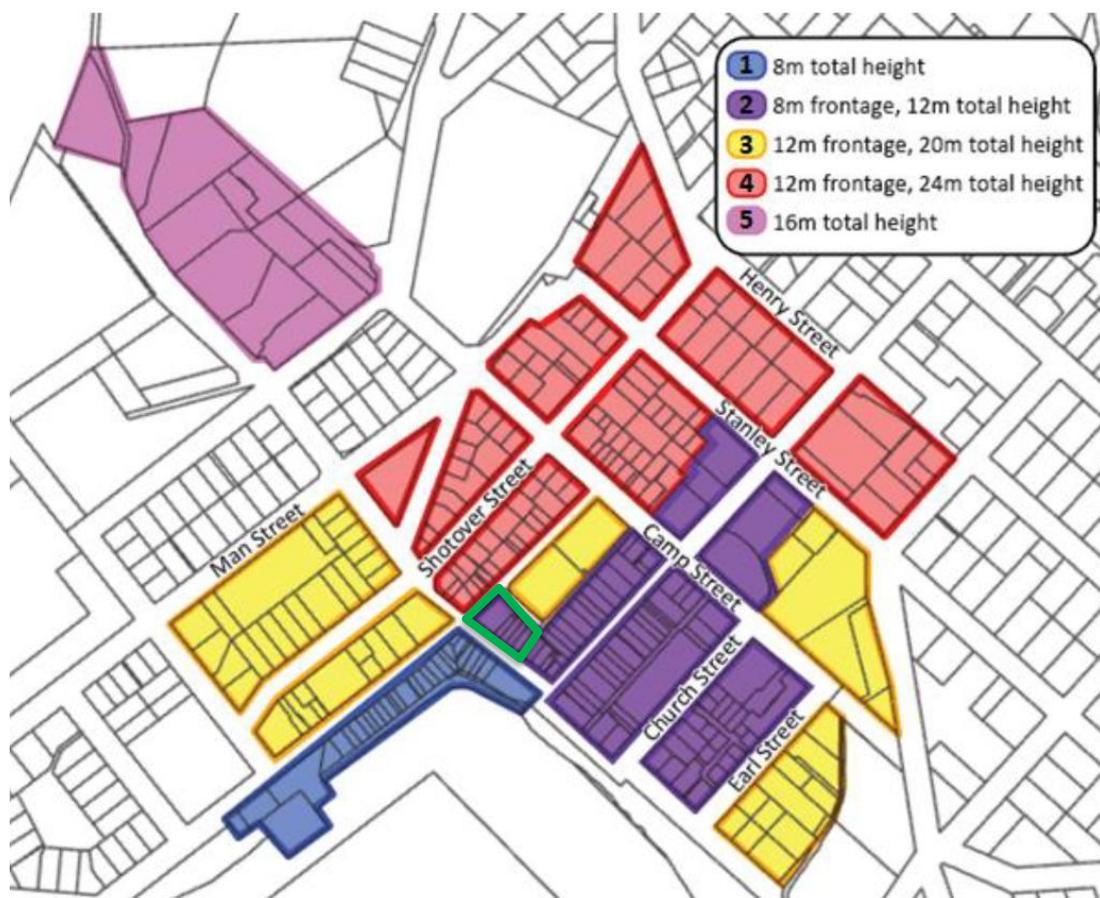


Figure 3: proposed Height Precincts Map, Subject Sites outlined in green.

- 6.5 In my opinion, the application of Height Precinct 3 to the Subject Sites would better give effect to the objectives and policies of the Queenstown Town Centre zone, as well as the NPSUD. The Subject Sites are centrally located, highly walkable, and not subject to heritage overlays. This makes them ideally suited to support higher intensity development, and as discussed later in this evidence, the 20m height aligns with Strategic Objective 3.2.1, Objectives 12.2.1, 12.2.2, and supporting policies that enable additional height where urban design principles are achieved and public amenity is maintained.
- 6.6 The Queenstown Town Centre UIV provisions also manage building massing through upper floor setbacks. In Height Precinct 2, a 4m setback from road boundaries is required for any portion of a building exceeding 8m. In Height Precincts 3 and 4, a 6m setback is required for any portion of a building exceeding 12m. While I support the application of this standard to key public streets, I consider that its application to Cow Lane, and service lanes in general, is unnecessary and undermines the intent of the NPSUD. Cow Lane is a narrow service lane with a distinct character that does not rely on the same public realm values as streets such as Rees or Beach Streets. In my opinion, removing the upper floor setback requirement from service lanes would not be inconsistent with the QLPDP Strategic Objective 3.2.1, and Objectives 12.2.1 and 12.2.2 or the supporting policies as set out in the UIV.
- 6.7 My opinion is supported by visual analysis evidence prepared by David Compten-Moen (DCM Urban Design). Mr Compten-Moen's evidence provides a series of street-level visualisations from six key public viewpoints (VP1–VP6). In each case, two height scenarios are presented: the permitted 12m height under Precinct 2, and the 20m height sought. These visuals demonstrate that:
- The proposed 20m built form integrates well with surrounding development, particularly given the immediate proximity of Height Precinct 4 (24m) and Height Precinct 3 on Beach Street on adjacent sites at 24, and 31-39 Beach Street. The increased height appears visually coherent and consistent with the intended intensification of the town centre.
 - Visual impacts from key public vantage points, including Earnslaw Park and the Queenstown Mall, are minimal. The street-level visualisations demonstrate that the building's presence does not dominate the skyline, nor does it disrupt views to the surrounding landscape, including Lake Whakatipu and Queenstown Hill.

6.8 I refer also to the Urban Design evidence of Mr. Compten-Moen which notes in section 5.2 that:

"The UIV proposes buildings on the northern side of Cow Lane to increase in height to 20m and buildings on the northern side of Beach Street to increase to 24m. The buildings on the southwestern side of Rees Street are to be limited to 8m although the existing Absolut Building at 50 Beach Street already breaches this height limit with a height of approximately 11.25m".

6.9 In his analysis Mr. Compten-Moen identifies that the proposed relief would ensure the site is consistent with the blocks to the northeast and northwest, while the building setback will allow buildings on site to visually step down to Rees Street, and relate well to the 8m high buildings on the southwestern side of Rees Street. Mr. Compten-Moen concludes that there are no building dominance effects or adverse urban design effects associated with the relief sought.

6.10 Mr. Compten-Moen's visual analysis also includes shading diagrams. The shading diagrams compare the shading effects associated with the Precinct 2 (12m) height standard as compared to the Precinct 3 (20m) height standard as applied to the Subject Sites. The shading diagrams address the summer solstice, autumn equinox, and winter solstice. These diagrams demonstrate that:

- Additional shading is largely confined to the Rees Street road corridor during summer and at the equinox during morning hours, between the hours of 10 and 12, and/or falls within the roofscape of, or shading generated by, neighbouring buildings.
- There is no increase in shading to Earnslaw Park or the Marine Parade, because existing buildings on the southwestern side of Rees Street and along Beach Street already shade Earnslaw Park and the lakefront.
- The shading diagrams also demonstrate that much of the shading experienced in the town centre is attributable to the surrounding topography, particularly Queenstown Hill and Ben Lomond.

6.11 In my opinion, the visual analysis prepared by Mr. Compten-Moen confirms that the increased height sought in the submission would not result in adverse amenity effects. The increased height maintains the human scale of the Town Centre as experienced from street level, retains and provides opportunities to frame important view shafts

from public places to the surrounding landscape, and maintains sunlight access to public places.

- 6.12 Overall, the UIV supports intensification where it is appropriately managed. The relief sought is consistent with the Queenstown Town Centre zone's objectives, responds to the urban design context, and gives effect to national direction promoting intensification in well-located urban environments.

7. SECTION 42A REPORT AND EVIDENCE OF QUEENSTOWN LAKES DISTRICT COUNCIL EXPERTS

Section 42A Report

- 7.1 I have reviewed the Section s42A report prepared by Corinne Frischknecht, which addresses submissions on the Urban Intensification Variation relating to the Queenstown Town Centre and Business zones. The report provides recommendations on the appropriateness of proposed policy and rule amendments, as well as the configuration of Height Precincts and building bulk and location standards, including upper level setbacks.
- 7.2 I have also reviewed the urban design evidence of Mr. Cam Wallace, prepared on behalf of Queenstown Lakes District Council, which addresses urban design matters arising from the UIV. Mr. Wallace's evidence provides an urban design assessment on the appropriateness of the height precinct framework, the rationale for upper floor setbacks, and the potential effects of increased height and density within the Queenstown Town Centre.

Building Height Setback

- 7.3 I note the following sections of Ms. Frischknecht's s42A as being relevant to the relief sought with regard to the building height setback standard and its application to main road frontages only.

5.117 ...Reid Investment Trust (878.4) requests that the building height setback standard apply to main road frontages only, and lanes be excluded, referencing Cow Lane in particular.

5.130 In my view, excluding lanes (e.g. Searle Lane and Cow Lane) would still achieve the overall outcome sought by Objective 3.2.1 in providing a planning

framework for development that is commercially feasible and contributing to a prosperous, resilient and equitable economy in the District, and promotes efficient use of land. Also, these laneways are generally much narrower in width, and therefore any additional shading from not providing setbacks at upper floors would not be noticeable. The reduced setback would also enhance passive surveillance in the laneways.

5.131 Even though Searle and Cow Lanes and Pedestrian Link #6 are mentioned specifically, Reid Investment Trust (878.4) refers to lanes in general. Therefore, my view is to exclude all laneways to provide consistency in how the rule is being applied.

- 7.4 In his urban design evidence, Cam Wallace, on behalf of Queenstown Lakes District Council, addresses the building height setback standard and its application to main road frontages as follows:

13.14 Reid Investment Trust (Submitter 878) seeks that the building height setback standard apply to main road frontages only, and lanes be excluded (e.g. Searle Lane and Cow Lane). I also understand that a number of other pedestrian links may trigger the upper floor setbacks. I note that some of these lanes serve a predominantly servicing function and / or are already extensively shaded by the existing low height of development in the town centre or are themselves partially enclosed by buildings / verandahs. Further, based on my own observations the use of the spaces by pedestrians is noticeably lower than the other main streets throughout the town centre (e.g. Ballarat Street, Beach Street and Shotover Street). As such, the potential benefits and purpose of Rule 12.5.8 are not likely to be directly applicable or even realisable in these spaces. Considering the instances where this would apply, I agree with the submitter and would support a refinement to 12.5.8 to exclude lanes within the Town Centre.

- 7.5 Further to the above, the Council Section 42A report recommends that the relief sought by Reid Investment Trust (878.4) be accepted and that Rule 12.5.8 is updated as follows, with the red text added:

S42A 12.5.8 Building *façade* height and setback at *of* upper floors

For the purpose of this rule, refer to the Height Precinct Map (Figure 2 at the end of this Chapter).

12.5.8.1 Within Precinct 2, a 4m minimum building setback from all road boundaries shall apply to the area of any building that exceeds a height of 8m from the ground level.

12.5.8.2 Within Precincts 3 and 4:

a) A 3m minimum building setback from all road boundaries shall apply to the area of any building that exceeds a height of 12m from the ground level, providing that the maximum height of the building is no greater than 16m.

b) For buildings greater than 16m in height, a 6m minimum building setback from all road boundaries shall apply to the area of any building that exceeds a height of 12m from the ground level.

Note: This rule does not apply in Precincts 1 and 5, or to boundaries adjoining Cow Lane, Searle Lane, or the pedestrian links identified in Figure 1 of this Chapter.

7.6 For the reasons set out above, I support the amendments to rule 12.5.8 as proposed by Ms. Frischknecht.

Height Precinct Amendment

8. I note the following sections of Ms. Frischknecht's s42A as being relevant to the relief sought with regard to the Height Precinct amendment.

5.66 Of the submissions in opposition, five submissions related to specific sites. It appears that the main purpose for wanting to be located within a different Precinct is to benefit from the associated height limit (i.e. to allow higher permitted heights in each of the locations sought by submitters). Unless further reasoning has been provided by the submitter, I have considered that the relief sought has been addressed under Section starting 5.56 of this report relating to maximum building heights in the QTCZ.

- 8.1 Further reasoning for the proposed additional height is provided in para's 6.5 through 6.9 in my evidence above as supported by the visual analysis evidence prepared by Mr Compten-Moen.
- 8.2 The NPSUD requires that district plans:
- Achieve well-functioning urban environments that promote housing choice and accessibility (Objective 1 and Policy 1);
 - Enable more people to live in, and more businesses and community services to be located near, a centre zone or employment opportunities in areas well-served by existing or planned public transport and/or areas where there is high demand for housing or for business land (Objective 3);
- 8.3 The policy directive of the NPSUD requires Tier 2 councils (such as QLDC) to set height limits which are enabling of high density development commensurate with a greater level of accessibility or relative demand for housing and business use in that location. There is also a need to have particular regard to the following matters (Policy 6):
- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement.*
 - (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:*
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and*
 - (ii) are not, of themselves, an adverse effect*
- 8.4 In addition, I note that the NPSUD modifies the way in which councils provide for height and development within urban areas. The application of Height Precinct 3 to the Subject Sites will be consistent with the objectives and policies of the NPSUD because:
- The Subject Sites are centrally located with good access to transportation, shops, jobs, and amenities within a walkable catchment and are in an area where there is high demand for housing and commercial space. A height of 20m will enable more employment opportunities and more people to live in this area (Objective 3).

- The Subject Sites are not located within a Heritage Precinct and should be enabling of a change in response to the diverse and changing needs, of people, communities and future generations (Objective 4).
- Increased height in this location will better enable the Town Centre to achieve a well functioning urban environment (Policy 1).
- Increased height will assist in ensuring sufficient development capacity is available to meet expected demand for housing and for business land (Policy 2).
- The Subject Sites are highly accessible to a range of commercial activities and community services and subject to high levels of demand for housing and business use and therefore commensurate heights and density of urban form should be enabled (Policy 5).
- There is need to recognise the planned urban built form may involve significant changes to an area, and that those changes may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types (Policy 6).

8.5 Furthermore, the objectives and policies of the QLPDP as amended by the UIV seek to promote intensified development and additional building height in appropriate areas, provided intensification is guided by best practice urban design principles and potential adverse effects on public amenity and character, including the maintaining of sunlight access to public spaces (particularly in the Special Character Area) are avoided or mitigated.

8.6 In summary the proposed 20m height standard is consistent with the above because:

- The proposed 20m building height will better enable Queenstown Lakes District Council to respond to the requirements of the NPSUD.
- The proposed 20m built form integrates well with surrounding development, particularly given the proximity of 24m Height Precinct 4 and 20m Height Precinct 3 on adjacent sites on Beach Street and Cow Lane. The increased height appears visually coherent and consistent with the intended intensification of the town centre.

- Visual impacts from key public vantage points, including Earnslaw Park and the Queenstown Mall, are minimal. The street-level visualisations demonstrate that the building's presence does not dominate the skyline, nor does it disrupt views to the surrounding landscape, including Lake Whakatipu and Queenstown Hill.
- Increased shading effects associated with 20m height standard are minimal. Additional shading is largely confined to the road corridor, and/or falls within the roofscape of, or shading generated by, neighbouring buildings.
- There is no increase in shading to Earnslaw Park or the Lakefront Area.
- The wider Queenstown Town Centre, including Queenstown Mall and Beach Street corridor, will not experience a level of additional shading that would result in a loss of amenity.
- The shading diagrams also demonstrate that much of the shading experienced in the town centre is attributable to the surrounding topography, particularly Queenstown Hill and Ben Lomond.

9. CONCLUSION

- 9.1 In conclusion, the relief sought by the Reid Investment Trust is consistent with the strategic direction of both the National Policy Statement on Urban Development and the objectives and policies of the Queenstown Town Centre zone. The proposed inclusion of 11–15, 17, and 19 Rees Street within Height Precinct 3 represents a logical refinement to the proposed height precincts, enabling greater development capacity in a highly accessible, centrally located part of the Town Centre that is not subject to heritage or viewshaft constraints.
- 9.2 The visual analysis which includes shading evidence prepared by Mr. Compten-Moen demonstrates that an increased height of 20m on the Subject Sites can be accommodated without resulting in material adverse effects on visual amenity or public spaces. Importantly, there is no increase in shading to Earnslaw Park or the Lakefront Area.
- 9.3 With regard to building height setbacks, the Council's s42A recommendation that Rule 12.5.8 be amended to exclude lanes, such as Cow Lane, from the building height setback standard is supported. This amendment reflects the spatial characteristics of

those environments and is supported by both the Section 42A reporting officer and Council's urban design advisor.

- 9.4 Overall, the relief sought by Reid Investment Trust will enable a well-functioning urban environment, and maintain the amenity values and character attributes that make Queenstown Town Centre a successful and distinctive place. I respectfully recommend that the relief sought by Reid Investment Trust be accepted in full.

SUMMARY OF EVIDENCE

- A. This urban design evidence is provided on behalf of Reid Investment Trust (**'Reid Trust'**), in relation to the Queenstown Urban Intensification Variation (**'UIV'**) initiated by Queenstown Lakes District Council (the **'Council'**), with regard to the intensification of the Queenstown Town Centre. Reid Trust is a submitter on the UIV, and are the owners of the site at 11-15 Rees Street, which is directly affected by the proposed UIV.

- B. My evidence addresses the inclusion of 11-15, 17, and 19 Rees St within Height Precinct 3 (increasing maximum building height from 12m to 20m), and the building height setback standard as it applies to laneways.

- C. Overall, it is my opinion that the Height Precinct 3 boundary should be modified to incorporate the site and adjacent properties, and that the building height setback standard be amended to exclude laneways as it will not result in adverse urban design effects.

1. INTRODUCTION, QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is David John Compton-Moen.
- 1.2 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.
- 1.3 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.
- 1.4 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:
- (a) 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.
 - (b) 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.
 - (c) 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.
 - (d) 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.

- (e) 2020 – Working with Hastings District Council and Stantec, a design guide was prepared for Intensification of Residential Areas within Hastings District.
- (f) 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.
- (g) 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).
- (h) 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.
- (i) 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.

1.5 I am familiar with the Submission and the relief sought by the Reid Trust for 11-15, 17, and 19 Rees St be included in Height Precinct 3 (increasing maximum building height from 12m to 20m) and; That the building height setback standard apply to main road frontages only, and that lanes (such as Cow Lane) be specific exclusions.

2. CODE OF CONDUCT

2.1 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Practice Note (2023) ('**Code**') and have complied with it in preparing this evidence. I also agree to follow the Code when presenting evidence to the Independent Hearing Commissioners. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state that I rely upon the evidence of other expert witnesses. I also confirm that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

3. SCOPE OF EVIDENCE

3.1 My evidence will deal with the following and should be read in conjunction with the appended Graphic Attachment:

- (a) Modelling of the Proposal Submission
- (b) Building Dominance Effects
- (c) Shading Effects

3.2 In the preparation of my evidence I have reviewed the following:

- (a) The UIV Section 42A (Town Centres and Business Zones) report prepared by Corinne Frischknecht, 6 June 2025;
- (b) UIV Statement of Evidence (Urban Design) by Cam Wallace, 6 June 2025; and
- (c) Planning Evidence of Mr Jason Ashby

4. MODELLING OF THE PROPOSAL SUBMISSION

- 4.1 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, to gain a better understanding of the spatial implications of the proposed increases.
- 4.2 We have also modelled the Reid Submission proposal which seeks greater Intensification potential with the height increasing to 20m with a 12m frontage. This has allowed photo-illustrations to be prepared from several locations (6 viewpoints) around the site to determine whether any Building Dominance Effects would result from the Submission.
- 4.3 Shading effects have also been modelled to determine the magnitude of change which would result from the Submission proposal. A key consideration were effects on the public spaces of Earnslaw Park and Marine Parade.

5. BUILDING DOMINANCE EFFECTS

- 5.1 To assist with assessing the degree of visual dominance, the proposal was viewed from a series of locations around the site. A series of illustrations were prepared to show how a potential 20m high building would appear with a 6m setback above 12m on street frontages.
- 5.2 The UIV proposes buildings on the northern side of Cow Lane to increase in height to 20m and buildings on the northern side of Beach Street to increase to 24m. The buildings on the southwestern side of Rees Street are to be limited to 8m although the

existing Absolut Building at 50 Beach Street already breaches this height limit with a height of approximately 11.25m.

- 5.3 The proposed submission would bring the site up to being consistent with the blocks to the northeast and northwest, while the Upper Floor Building setback will allow buildings on site to visually step down to Rees Street, and relate well to the 8m high buildings on the southwestern side of Rees Street.
- 5.4 Overall, when considering the proposed UIV proposal including the Upper Floor Building Setback, the proposed Submission heights are not considered to generate any Building Dominance issues.

6. SHADING EFFECTS

- 6.1 Shade modelling was undertaken to determine whether the proposed height increase would have an adverse effect on the amenity of Earnslaw Park or Marine Parade. Scenarios were run for Winter and Summer Solstices as well as the Equinox with the two shadows generated (UIV v Submission) to determine the extent of any additional shading. The buildings on the southern side of Rees St were also modelled noting that the UIV proposes an 8m height limit for this block. Most of the existing buildings in this block are this height (2 storeys) with the exception of 50 Beach Street (Absolut Hostel) which is ~11.25m (4 storeys) and has a 4m high service stack on its roof.
- 6.2 The diagrams show that there would be some additional shading on Rees St during summer and at the equinox during morning hours, between the hours of 10 and 12. In the afternoon the additional height will have no effect on Rees St. In winter months the additional height does not have an effect on the street corridor although shading will extend further up the buildings on the southwestern side of Rees Street.

It is apparent from the modelling that no additional shading will be generated from the additional height proposed on Earnslaw Park or Marine Parade. The existing buildings on the southwestern side of Rees Street and along Beach Street already shade Earnslaw Park and the lakefront with the proposed submission not adding to this.

7. CONCLUSIONS

- 7.1 In reviewing the proposed UIV provisions and modelling of the Submission, I am of the opinion that:
 - (a) There are no Building Dominance issues resulting from the relief sought by The Reid Trust as it would be consistent with the blocks immediately to the northeast and northwest;

- (b) There are no additional shading effects resulting from the relief sought on Earnslaw Park or Marine Parade;
- (c) Overall, it is my opinion that the Height Precinct 3 boundary should be modified to incorporate the site and adjacent properties, and that the building height setback standard be amended to exclude laneways as it will not result in adverse urban design effects.



GRAPHIC ATTACHMENT

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 878) - REES ST
FOR REID INVESTMENT LIMITED

4 JULY 2025
PROJECT NO. 2024_082
REVISION C



URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 878) - REES STREET

Project no: 2024_082
Document title: Urban intensification Variation Submission - Graphic Attachment
Revision: C
Date: 4 JULY 2025
Client name: Reid Investment limited

Author: Dave Compton-Moen

File name: 2024_082 Reid Rees St Urban Intensification_c

DOCUMENT HISTORY AND STATUS

REVISION	DATE	DESCRIPTION	BY	REVIEW	APPROVED
A	09/08/2024	Issue for Comment	DCM	DCM	DCM
B	30/10/2024	Issue for Comment	DCM	DCM	DCM
C	4/07/2025	UDA EVIDENCE	DCM	DCM	DCM



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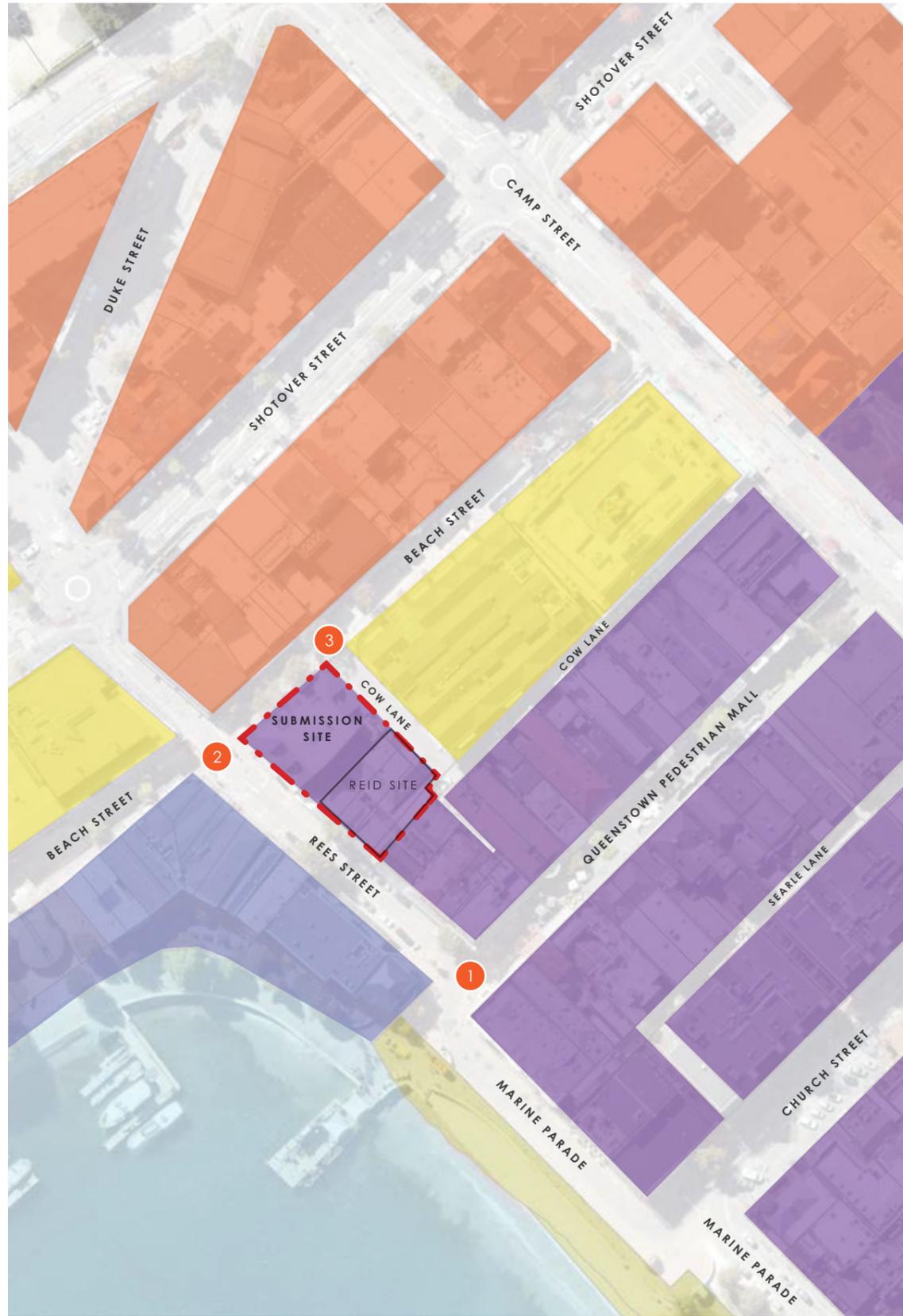
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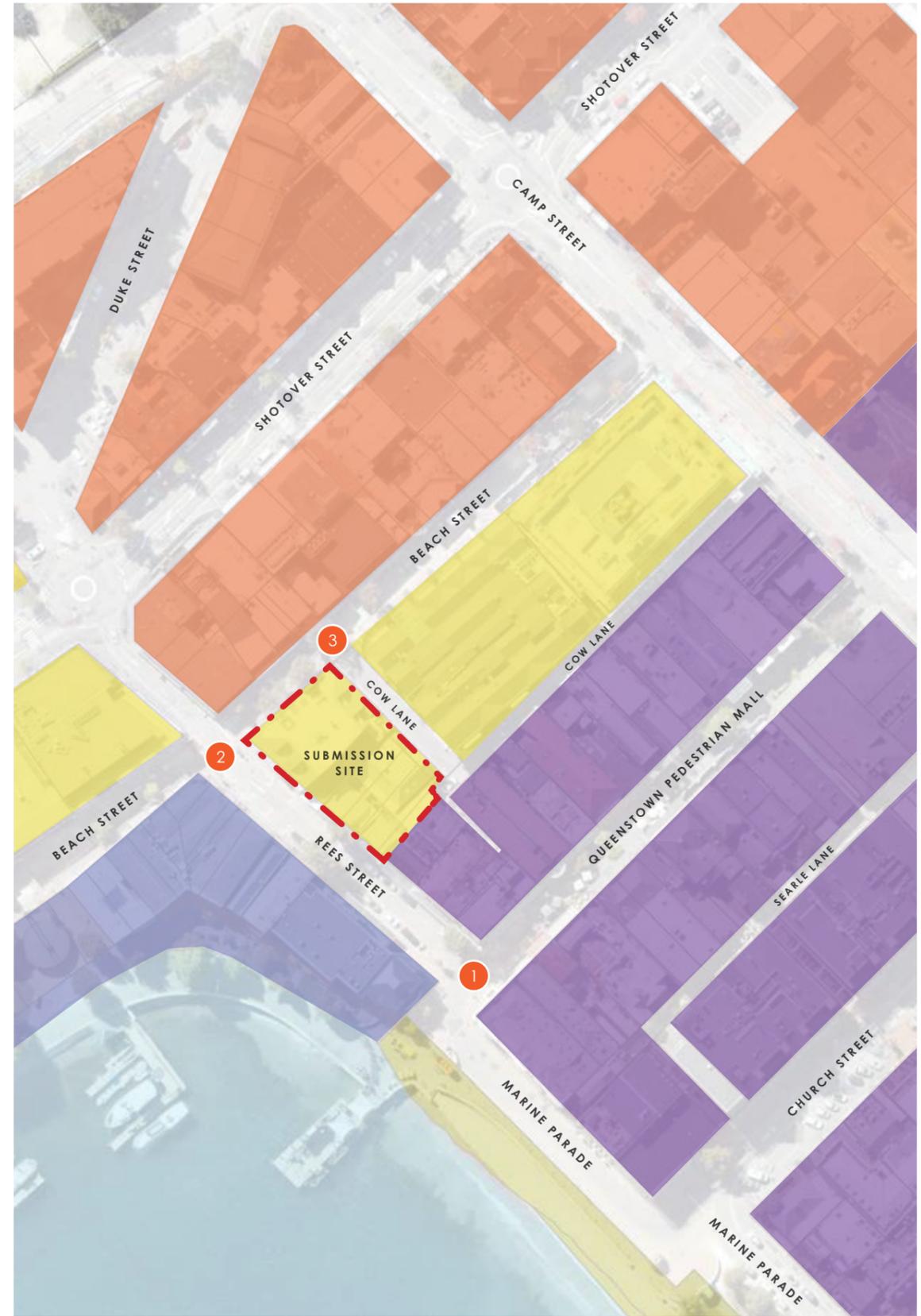
LEGEND

- Precinct 1 - 8m total height
- Precinct 2 - 12m total height
- Precinct 3 - 20m total height
- Precinct 4 - 24m total height

- Submission Site
(including 11-15 Rees Street)



A. PROPOSED QUEENSTOWN LAKE DISTRICT PLAN (1:2,000 @ A3)



A. SUBMISSION AMENDMENT TO PROPOSED DISTRICT PLAN (1:2,000 @ A3)

client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **PRECINCTS MAP**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: 1:2000 @ A3

revision no:	amendment:
A	Issue for Comment
B	Issue for Comment
C	UDA Evidence

approved	date
DCM	19/08/2024
DCM	30/10/2024
DCM	03/07/2025



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project no / drawing no: **2024_123 / 001**

revision: **C**



A. PHOTO VIEWPOINT LOCATIONS (1:1,000 @ A3)

client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **PHOTO VIEWPOINT LOCATIONS**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: **1:1,000@A3**

revision no:	amendment:
A	Issue for Comment
B	Issue for Comment
C	UDA Evidence

approved	date
DCM	19/08/2024
DCM	30/10/2024
DCM	03/07/2025



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project no / drawing no: **2024_123 / 002**

revision: **C**



A. IMAGE LOCATION



QUEENSTOWN CASINO
 PROPOSED PDP HEIGHT 12M
 PROPOSED SUBMISSION HEIGHT 20M



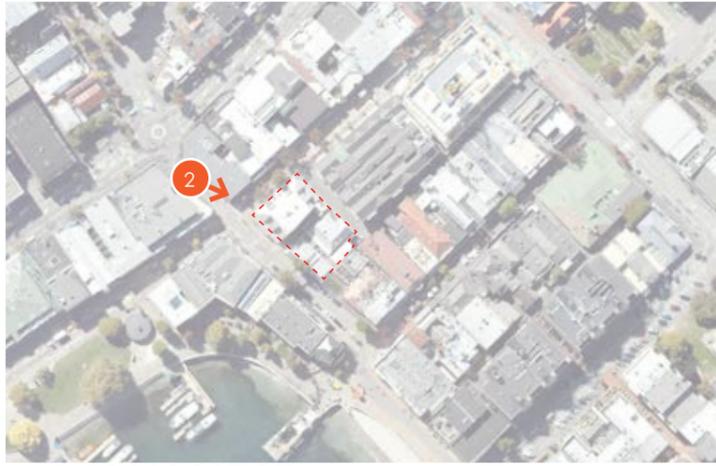
B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

VP1 - BEACH STREET NORTH

REID INVESTMENT LIMITED

04.07.2025 | 2024_082 Reid Rees St Urban Intensification_c



A. IMAGE LOCATION

PROPOSED SUBMISSION
HEIGHT 20M

PROPOSED PDP
HEIGHT 12M

THE SITE
11-15 REES ST

LIGHTWORX
GALLERY



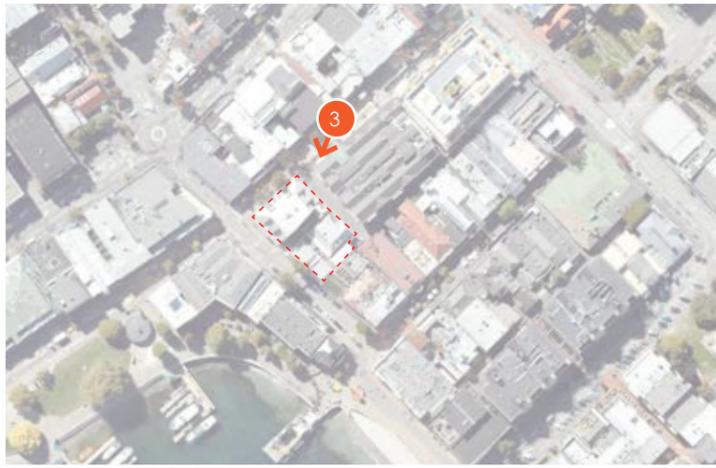
B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

VP2 - REES STREET SOUTH

REID INVESTMENT LIMITED

04.07.2025 | 2024_082 Reid Rees St Urban Intensification_c



A. IMAGE LOCATION

QUEENSTOWN CASINO

PROPOSED SUBMISSION HEIGHT 20M

PROPOSED PDP HEIGHT 12M

EARNSLAW PARK



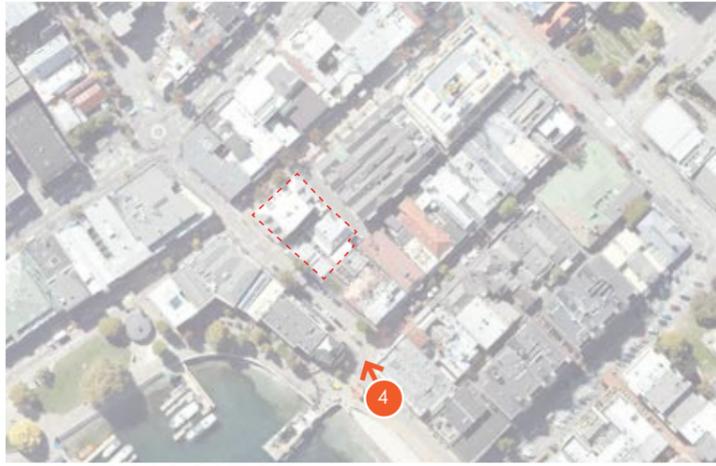
B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

VP3 - BEACH STREET SOUTH

REID INVESTMENT LIMITED

04.07.2025 | 2024_082 Reid Rees St Urban Intensification_c



A. IMAGE LOCATION



WILLIAM REES
STATUE

PROPOSED PDP
HEIGHT 12M

THE SITE
11-15 REES ST

PROPOSED SUBMISSION
HEIGHT 20M

LIGHTWORX
GALLERY



MARINE PARADE

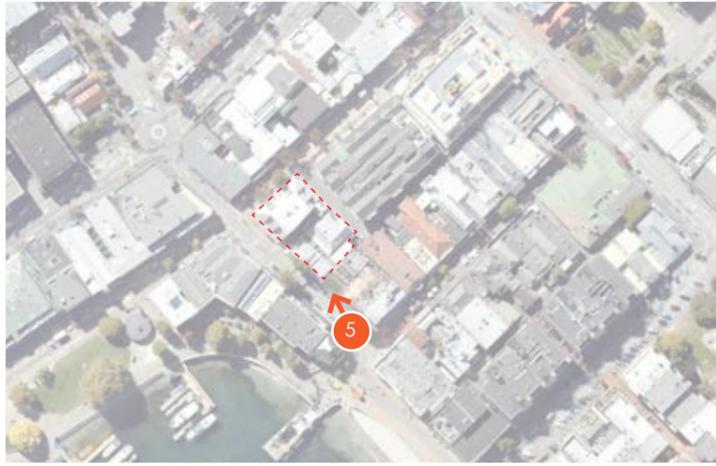
B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

VP4 - MARINE PARADE NORTH

REID INVESTMENT LIMITED

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A. IMAGE LOCATION

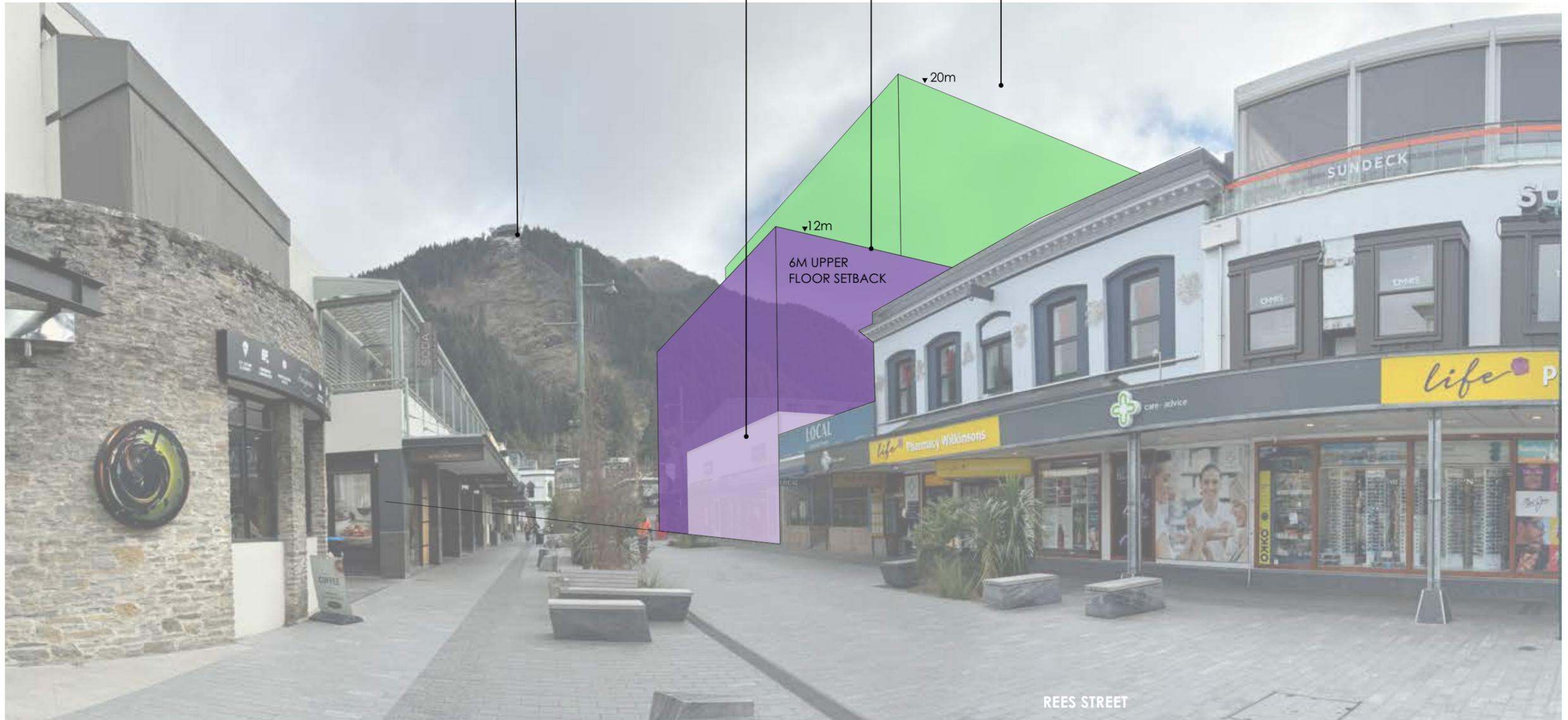


QUEENSTOWN
ULTIMATE
VIEWPOINT

THE SITE
11-15 REES ST

PROPOSED PDP
HEIGHT 12M

PROPOSED SUBMISSION
HEIGHT 20M



B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

VP5 - REES STREET NORTH

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04.07.2025 | 2024_082 Reid Rees St Urban Intensification_c



A. IMAGE LOCATION

QUEENSTOWN HILL RECREATION RESERVE

PROPOSED SUBMISSION HEIGHT 20M

LIGHTWORX GALLERY

LAKE WHAKATIPU



B. PROPOSED VIEW

URBAN INTENSIFICATION VARIATION SUBMISSION (SUBMITTER 787) - REES STREET

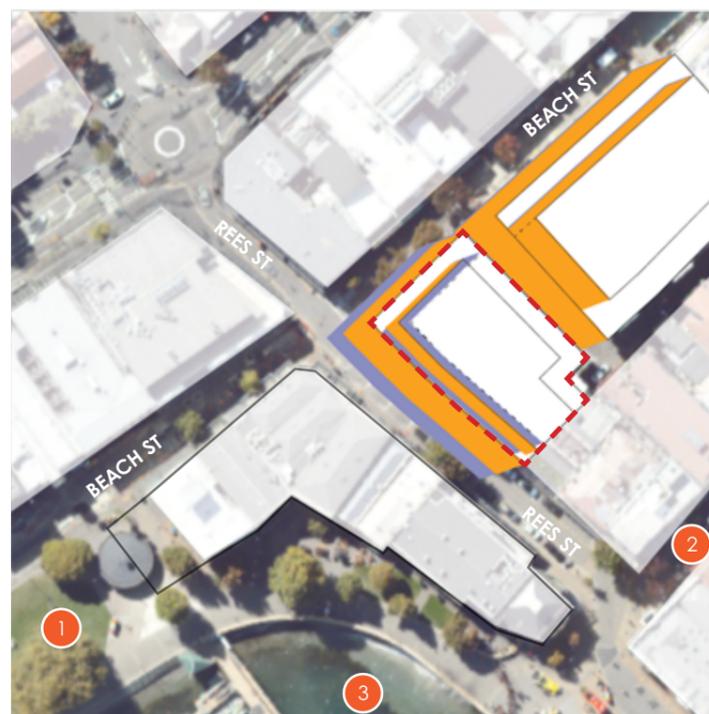
VP6 - EARNSLAW PARK NORTH

REID INVESTMENT LIMITED

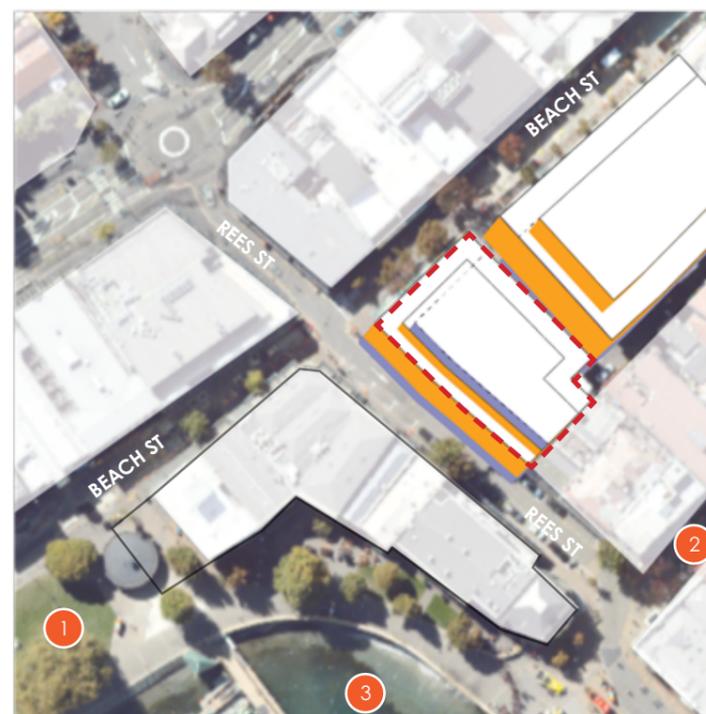
04.07.2025 | 2024_082 Reid Rees St Urban Intensification_c

LEGEND

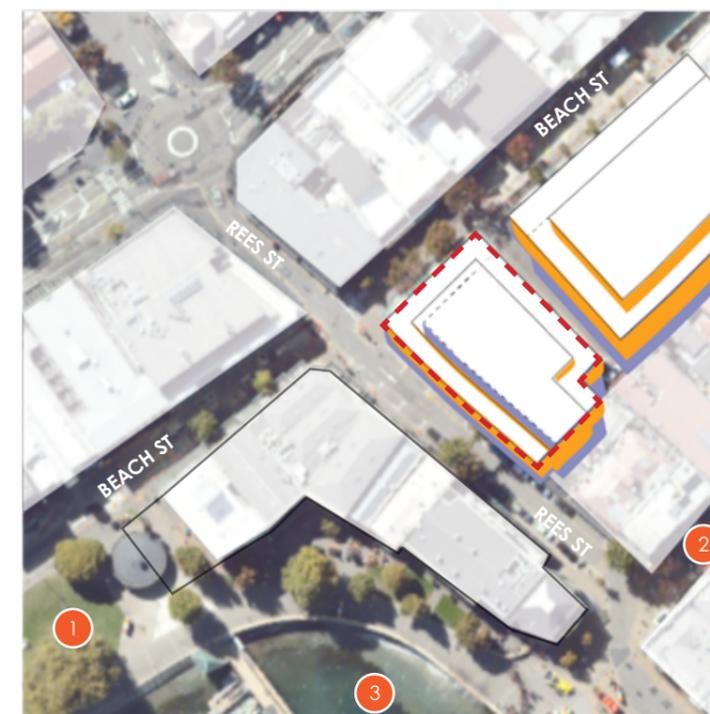
- Shadow cast by Maximum Precinct Form permitted under the proposed Amendment to the District Plan
- Shadow cast by Maximum Precinct Form permitted under the proposed Variation Amendment to the District Plan in this submission
- Precinct 2 setback line
- 8m frontage, 4m setback, 12m total height
- Precinct 3 setback line
- 12m frontage, 6m setback, 20m total height
- 1 Earnslaw Park
- 2 Queenstown Mall
- 3 Lake Wakatipu



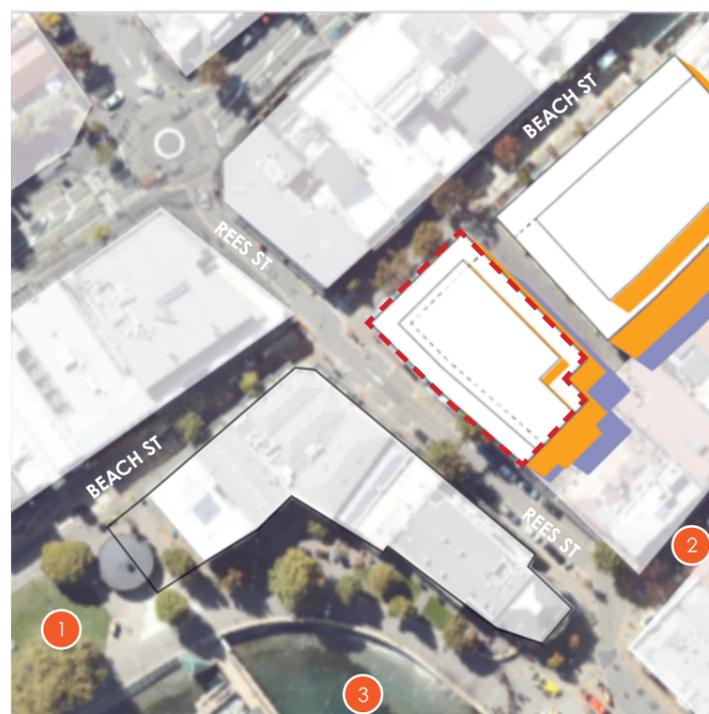
9:00 am - Summer Solstice - Dec 21



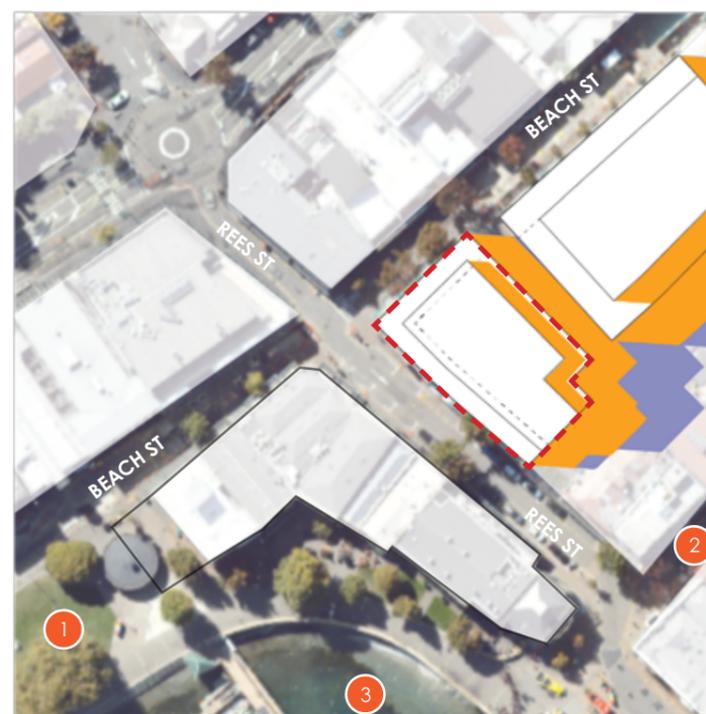
10:30 am - Summer Solstice - Dec 21



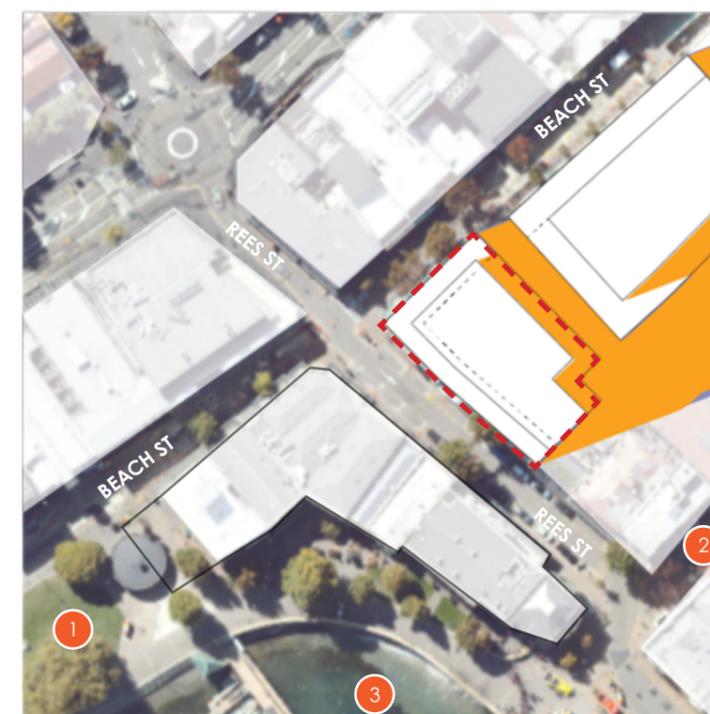
12:00 pm - Summer Solstice - Dec 21



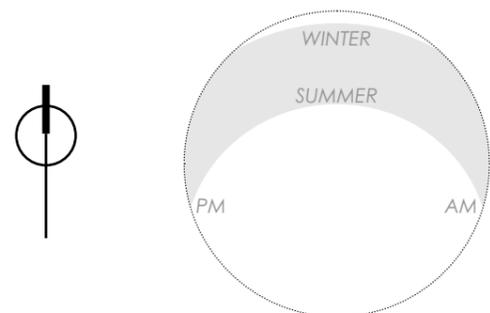
1:30 pm - Summer Solstice - Dec 21



3:00 pm - Summer Solstice - Dec 21



6:00 pm - Summer Solstice - Dec 21



client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **SHADE DIAGRAM - SUMMER SOLSTICE**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: 1:1500 @ A3

revision no:
A Issue for Comment
B Issue for Comment
C UDA Evidence

approved
DCM
DCM
DCM

date
19/08/2024
30/10/2024
03/07/2025



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ARCHITECT



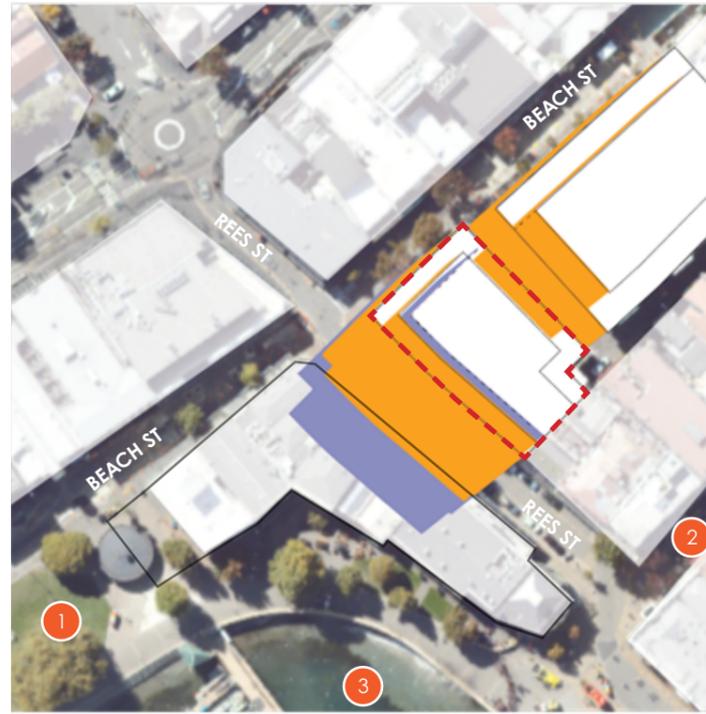
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project no / drawing no: **2024_123 / 009**

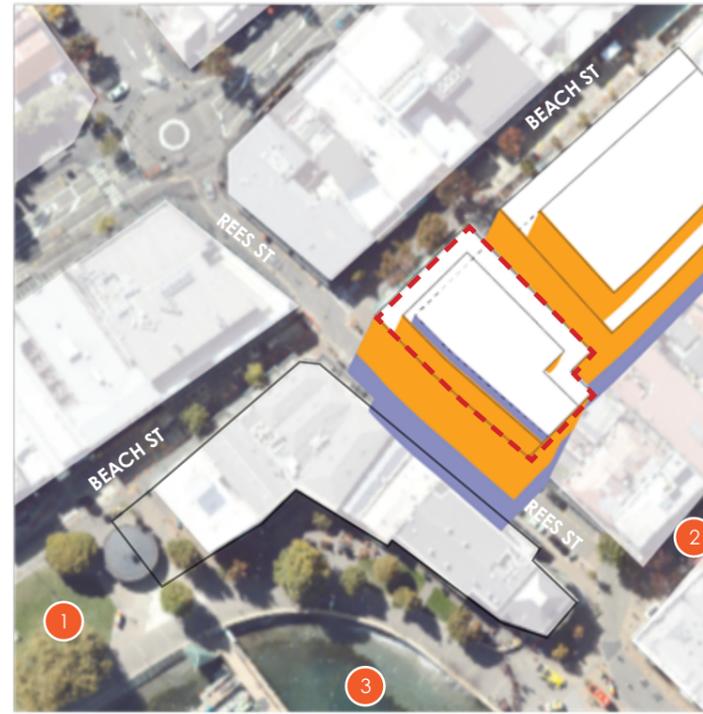
revision: **C**

LEGEND

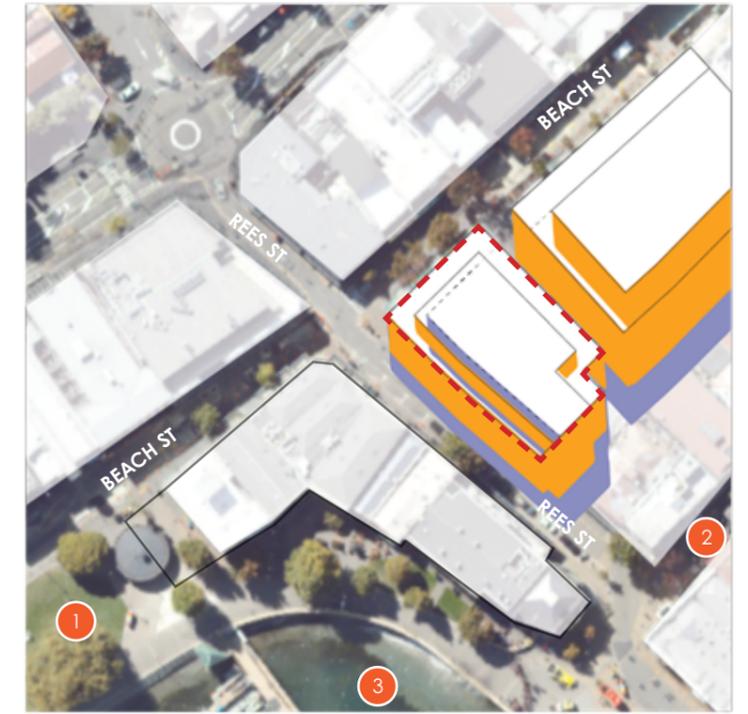
- Shadow cast by Maximum Precinct Form permitted under the proposed Amendment to the District Plan
- Shadow cast by Maximum Precinct Form permitted under the proposed Variation Amendment to the District Plan in this submission
- Precinct 2 setback line
- 8m frontage, 4m setback, 12m total height
- Precinct 3 setback line
- 12m frontage, 6m setback, 20m total height
- 1 Earnslaw Park
- 2 Queenstown Mall
- 3 Lake Wakatipu



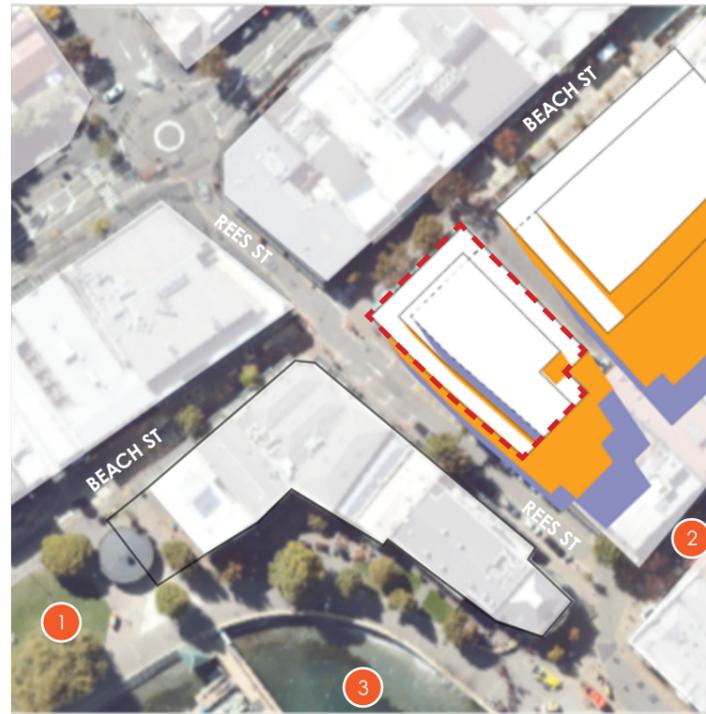
9:00 am - Equinox



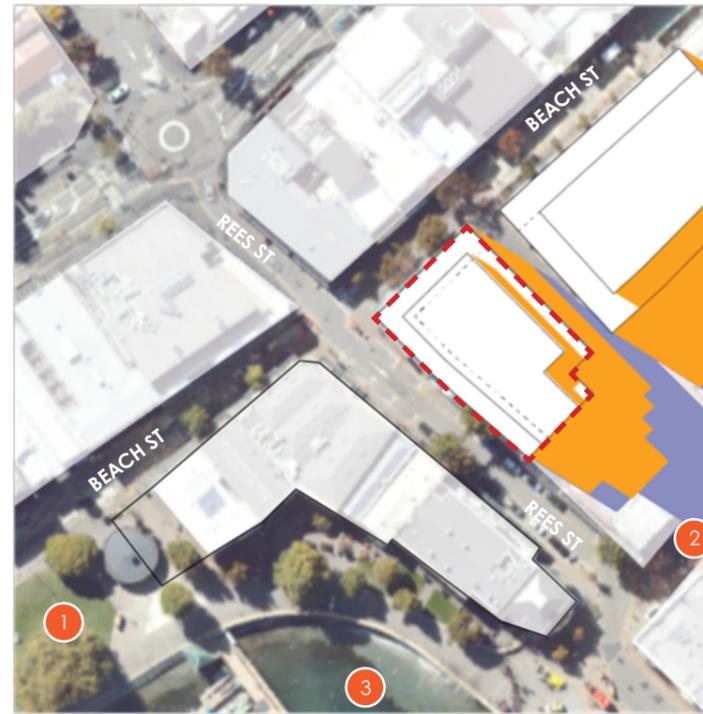
10:30 am - Equinox



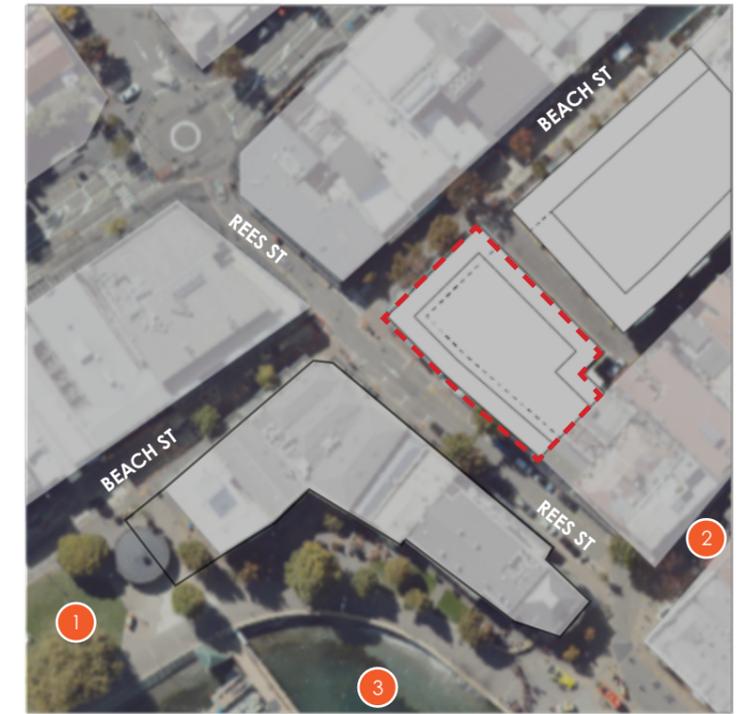
12:00 pm - Equinox



1:30 pm - Equinox

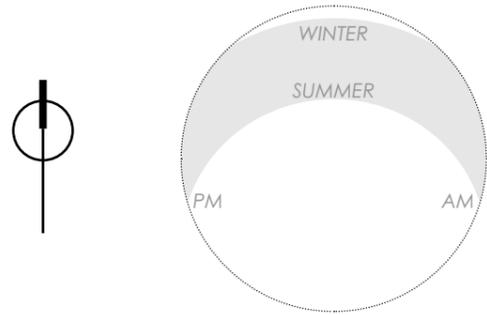


3:00 pm - Equinox



6:00 pm - Equinox

* Shading at this time, in which Queenstown CBD is in shade, this is caused by Ben Lomond and Queenstown Hill to the North and North-West of site.



client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **SHADE DIAGRAM - AUTUMN / SPRING EQUINOX**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: 1:1500 @ A3

revision no:
A Issue for Comment
B Issue for Comment
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03/07/2025



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project no / drawing no: **2024_123 / 0010**

revision: **C**

LEGEND

Shadow cast by Maximum Precinct Form permitted under the proposed Amendment to the District Plan

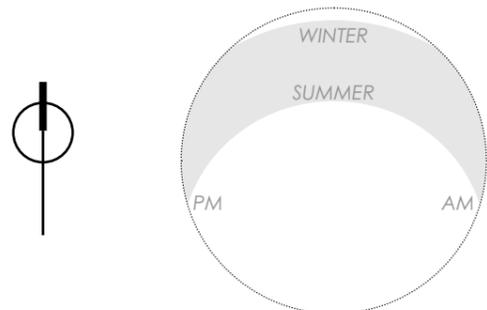
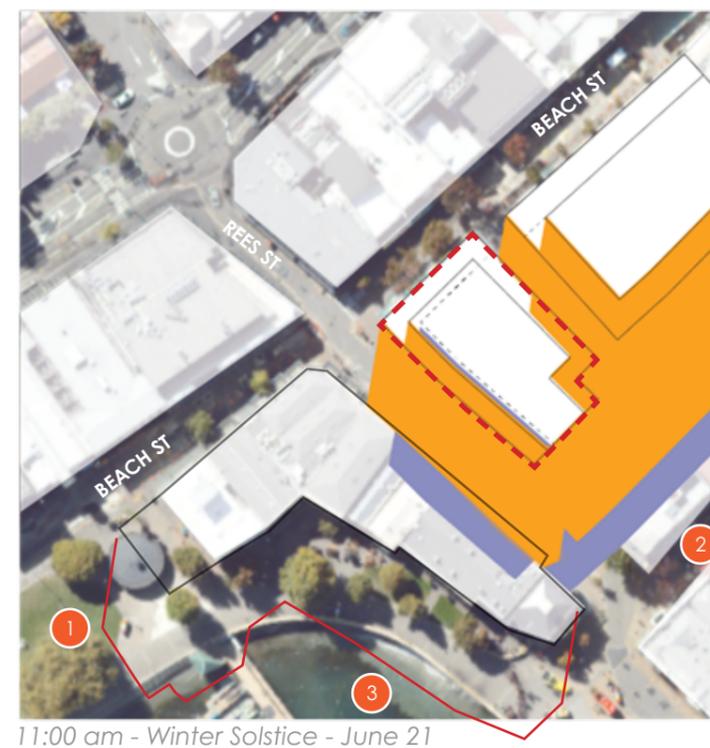
Shadow cast by Maximum Precinct Form permitted under the proposed Variation Amendment to the District Plan in this submission

Shadow created by existing Lakefront Buildings including, Absolut Building at 50 Beach Street which is 11.25m high with a 4m high service shaft on its roof.

Precinct 2 setback line
- 8m frontage, 4m setback, 12m total height

Precinct 3 setback line
- 12m frontage, 6m setback, 20m total height

- Earnslaw Park
- Queenstown Mall
- Lake Wakatipu



client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **SHADE DIAGRAM - WINTER SOLSTICE**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: 1:1500 @ A3

revision no:
A Issue for Comment
B Issue for Comment
C UDA Evidence

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DCM
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date
19/08/2024
30/10/2024
03/07/2025



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LANDSCAPE
ARCHITECT



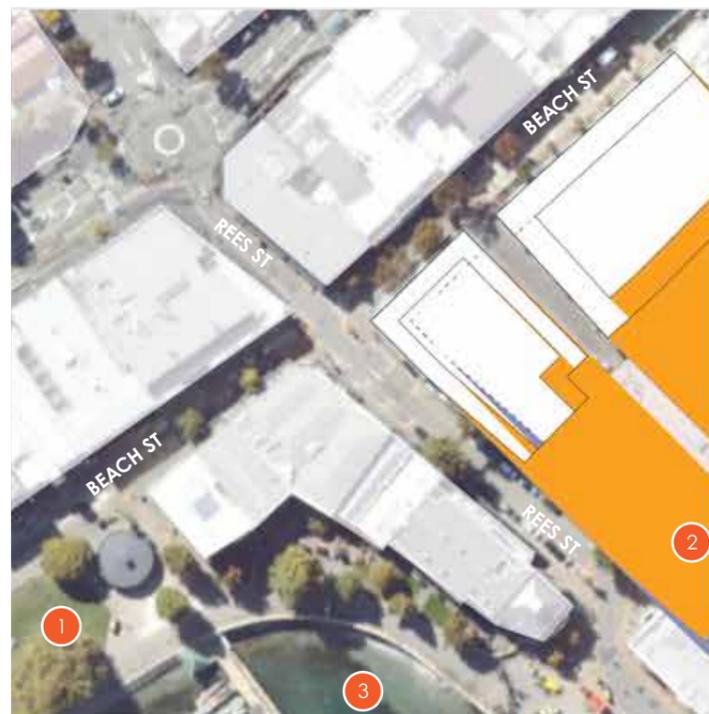
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project no / drawing no: **2024_123 / 0011**

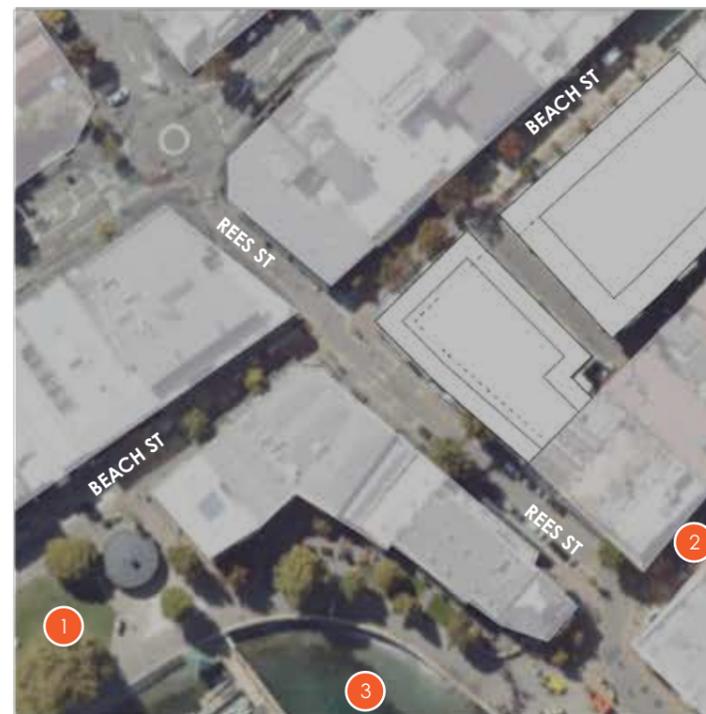
revision: **C**

LEGEND

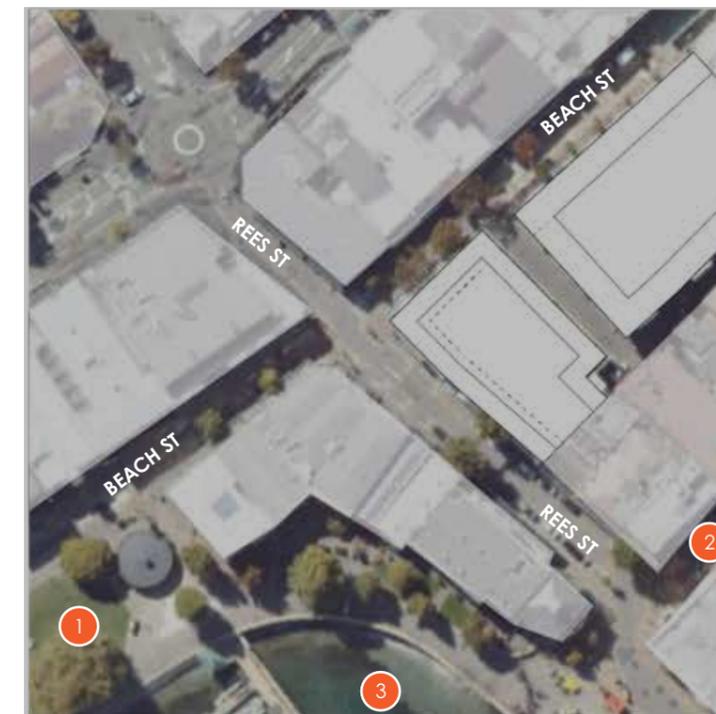
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- 3 Lake Wakatipu



3:00 pm - Summer Solstice - Dec 21



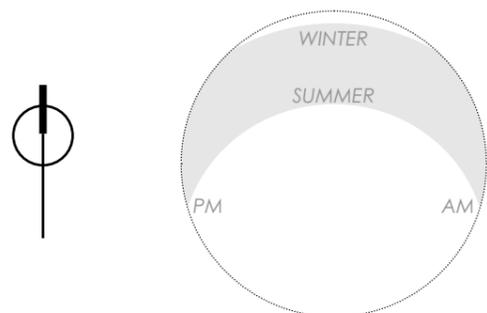
4:00 pm - Summer Solstice - Dec 21



5:00 pm - Summer Solstice - Dec 21

* Shading at this time, in which Queenstown CBD is in shade, this is caused by Ben Lomond and Queenstown Hill to the North and North-West of site.

* Shading at this time, in which Queenstown CBD is in shade, this is caused by Ben Lomond and Queenstown Hill to the North and North-West of site.



client / project name: REID / UIV SUBMISSION (SUBMITTER 787)
drawing name: **SHADE DIAGRAM - WINTER SOLSTICE**
designed by: DAVE COMPTON-MOEN
drawn by: DAVE COMPTON-MOEN
original issue date: 09 AUGUST 2024
scale: 1:1500 @ A3

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project no / drawing no: **2024_123 / 0012**

revision: **C**