

under: the Resource Management Act 1991

In the matter of: Submissions and Further submissions  
on the Queenstown Lakes  
Proposed District Plan

and: Urban Intensification Variation

and: Millennium & Copthorne  
Hotels New Zealand Limited  
(Further Submitter 1344)  
And  
Hospitality Group Limited  
(Further Submitter 1345)

## **1.0 Introduction**

- 1.1 My full name is John Bernard Edmonds.
- 1.2 I hold the qualification of a Bachelor of Regional Planning from Massey University. I am a full member of the New Zealand Planning Institute.
- 1.3 I have 34 years' experience in planning and resource management roles, including strategic planning, master planning, urban design, policy development, project management and other resource management consultancy services. I have worked in both local government and private sector roles.
- 1.4 My previous roles include five years at Nelson City Council and six years with the Queenstown Lakes District Council (QLDC), most of that time (1997-2001) as the District Planner.
- 1.5 In January 2001 I went into private consultancy, establishing John Edmonds & Associates. In this role I have managed planners, environmental scientists and more recently surveyors and project managers. I have been personally responsible for master planning, strategic planning, preparing resource consent applications and assessments of effects, and been the principal consultant assisting with planning and environmental issues for a range of significant local developments. I have also presented evidence at Council and Environment Court hearings.
- 1.6 I am familiar with submissions 986 and 1008 on the Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and further submissions 1344 and 1345.

## **2.0 Code of Conduct**

- 2.1 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Environment Court's Code of Conduct for Expert Witnesses in its 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.

### 3.0 The Submitter and Site Context

- 3.1 This evidence is prepared in respect of two further submissions prepared on behalf of related entities that own two separate blocks of land within the same neighbourhood.
- 3.2 Millennium & Copthorne Hotels New Zealand Limited (M&C) owns land at 31 Frankton Road. This land contains the Copthorne Hotel and Lakefront Resort, which has 240 hotel rooms and guest facilities.
- 3.3 Hospitality Group Limited (HGL) owns land at 32 Frankton Road. This land contains the Millennium Hotel, which has 220 rooms and guest facilities, including a business/conference room.
- 3.4 Both blocks of land are zoned High Density Residential and that zoning is not proposed to be changed by the Variation.

### 4.0 The Submissions and Further Submissions

- 4.1 The submission points are identified in the table below.

| Submission # | Submitter  | Summary  | S.42a Recommendation |
|--------------|--|--|----------------------|
| OS1008.12    | Ashourian Partnership                              | That an 18.5m height limit be imposed for the site (12 16 20 Stanley St and 12 Sydney St, Queenstown) and four blocks in the vicinity of the site. | Reject               |
| FS1344.2     | Millennium & Copthorne Hotels New Zealand Limited. | Supports relief sought in OS1008.12  | Reject               |
| FS1345.2     | Hospitality Group Limited                          | Supports relief sought in OS1008.12  | Reject               |

|          |  |   |        |
|----------|--|---|--------|
| OS986.12 | Pro-Invest NZ<br>Property 1 Limited<br>Partnership         | That an 18.5m height limit be imposed for the site (Lot 1 DP 525804) and four blocks in the vicinity of the site. | Reject |
| FS1344.1 | Millennium &<br>Copthorne Hotels<br>New Zealand<br>Limited | Supports relief sought in OS986.12  | Reject |
| FS1345.1 | Hospitality Group<br>Limited                               | Supports relief sought in OS986.12  | Reject |

## 5.0 Details of Further Submissions in Contention

- 5.1 Both Pro-Invest NZ Property 1 Trust Limited Partnership and Ashourian Partnership seek the height limit to increase to 18.5m for the block of land bound by Frankton Road, Coronation Drive, Melbourne Street and Beetham Street. This is the primary point in contention.
- 5.2 Both M&C and HGL made a further submission in general support of those increased heights. M&C made an additional further submission seeking the land at 31 Frankton Road (Lot 1 DP 25442 and Lot 2 DP 25442) should also be included within the area of increased height to 18.5m, as a logical extension of the proposed area.
- 5.3 The s42a report recommends retaining the 16.5m height limit as notified.
- 5.4 The M&C land is the entire block of land bound by Frankton Road, Adelaide Street, Park Street and Hobart Street. There are no other landowners within this block of land.
- 5.5 The Original Submissions 1008 and 968 describe similarities between the four blocks of land, including visitor accommodation as the predominant land use and short walking distance to public transport and central Queenstown. The Original Submissions also reference higher scaled development in the four blocks will provide an “amphitheatre” to central Queenstown.

- 5.6 I agree with the similarities listed for the four blocks of land. I consider that an 18.5m height limit through this precinct would be appropriate, as there is a recognised predominant concentration of hotels and visitor accommodation in this area. Any breach of that height limit would be addressed through a Restricted Discretionary consent, in the same manner as other High Density Residential neighbourhoods.
- 5.7 The M&C land at 31 Frankton Road is directly opposite two of the blocks included in the requested area for additional height. The use of the land is also a visitor accommodation use and existing residential dwellings closer to the lakefront. I expect that M&C may look to redevelop this lower site with a comprehensive land use in future or extension of the hotel. The entrance to the Copthorne Hotel and Lakefront Resort is from Frankton Road, in the vicinity of the two blocks requested for increased height. The site directly opposite is the Ramada Hotel, which has a consented height of 17.5m.
- 5.8 I can see merit in the top part of the block increasing to 18.5m as a logical extension of the four blocks referenced in the original submissions. This part of the site is relatively flat and then gently slopes towards the lake. I also see merit in the bottom part of the block (Lot 2 DP 25442 being increased to 18.5m as part of an increased height corridor off Frankton Road, as a highly accessible transport route.
- 5.9 The bottom part of the block does have a more dramatic slope than the upper lot. I would also support the Variation as notified for a 16.5m limit for this lower section, as this could encourage a small 'stepping up' in the built form away from the lake.
- 5.10 The increased height (18.5m) for the respective corridor would enable no more than one additional floor than the 16.5m notified height limit in the Variation. As above, any exceedance would require Restricted Discretionary activity consent in the same manner as other high density residential areas i.e. the neighbouring sites to the east and west.
- 5.11 I suggest that the amended wording of this rule refer to a new height precinct that would be identified on the planning map.

- 9.5.1.1A Within the area specified on the District Plan web mapping application within the blocks bound by:
- i. Frankton Road, Coronation Drive, Melbourne Street and Beetham Street a height of 18.5 metres.
  - ii. Frankton Road, Adelaide Street and Hobart Street (Lot 1 DP 25422) a height of 18.5 metres.

## **6.0 Section 32AA analysis**

6.1 For completeness, I provide the following comments for section 32AA analysis of including an additional rule 9.5.1.1A:

- There are benefits for plan administration and efficiency in having a single permitted height limit and consenting pathway, as opposed to a tiered approach. Providing additional height in the corridor proposed would enable intensification close to Frankton Road, which is identified as an area of high accessibility. This approach is in line with the NPS-UD Policy 5 to enable increased height and density commensurate to the accessibility and demand of the area.
- There are no other landowners within the block of M&C land that need to be considered.
- Adverse effects of building height can be managed through the resource consent process. The framework of standards in the High Density Residential zone provisions also cover other aspects of built form that may require resource consent and management of potential effects, in accordance with the RMA.
- Addition of a mapping layer and rule description for the land will provide clarity for plan users both visually on the electronic mapping software and through plan text. Improved clarity reduces costs in plan administration.

## **8.0 Conclusion**

- 8.1 I consider that a separate height precinct close to the centre of Queenstown that provides the opportunity for additional height is appropriate and will implement the objectives and policies of the PDP. The four blocks referenced in the original submissions and the additional M&C land sought in further submission FS1344 are an appropriate corridor for this additional height.

**John Edmonds**

Dated 4 July 2025