

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of submissions and further submissions  
of the QLDC Proposed District Plan –  
Urban intensification variation

**BY** **CITY IMPACT CHURCH**  
**QUEENSTOWN INCORPORATED**

Submitter 775

**AND** **NO. 1 HANSEN ROAD LIMITED**

Submitter 766

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**STATEMENT OF EVIDENCE OF CHARLOTTE CLOUSTON**

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Dated: 4 July 2025

## **Statement of evidence of Charlotte Clouston**

### **Introduction**

- [1] My full name is Charlotte Lee Clouston.
- [2] I hold the qualifications of Bachelor of Laws (Honours) and Bachelor of Science (Environmental Science and Geography) from the University of Auckland.
- [3] I have 6 years' experience practicing as a planner. Prior to planning, I practiced resource management law for over 2 years. I currently work as a planner for John Edmonds & Associates in Queenstown.
- [4] I am familiar with City Impact Church and No. 1 Hansen Road submissions on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the **Variation**) to the Queenstown Lakes Proposed District Plan (**PDP**) and the respective interests in land at 1 and 3 Hansen Road, Frankton.

### **Code of Conduct**

- [5] 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.

### **Scope of evidence**

- [6] In preparing my evidence, I have reviewed:
- (a) Submission 775 and Further Submission 1330
  - (b) Submission 766 and Further Submission 1331
  - (c) Further Submissions on Submissions 775 and 766
  - (d) Section 42A Reports, dated 6 June 2025

- (e) QLDC Proposed District Plan
- (f) QLDC Operative District Plan
- (g) Section 32 Report and Appendix 3 - Demand and Accessibility Assessment
- (h) National Policy Statement on Urban Development 2020

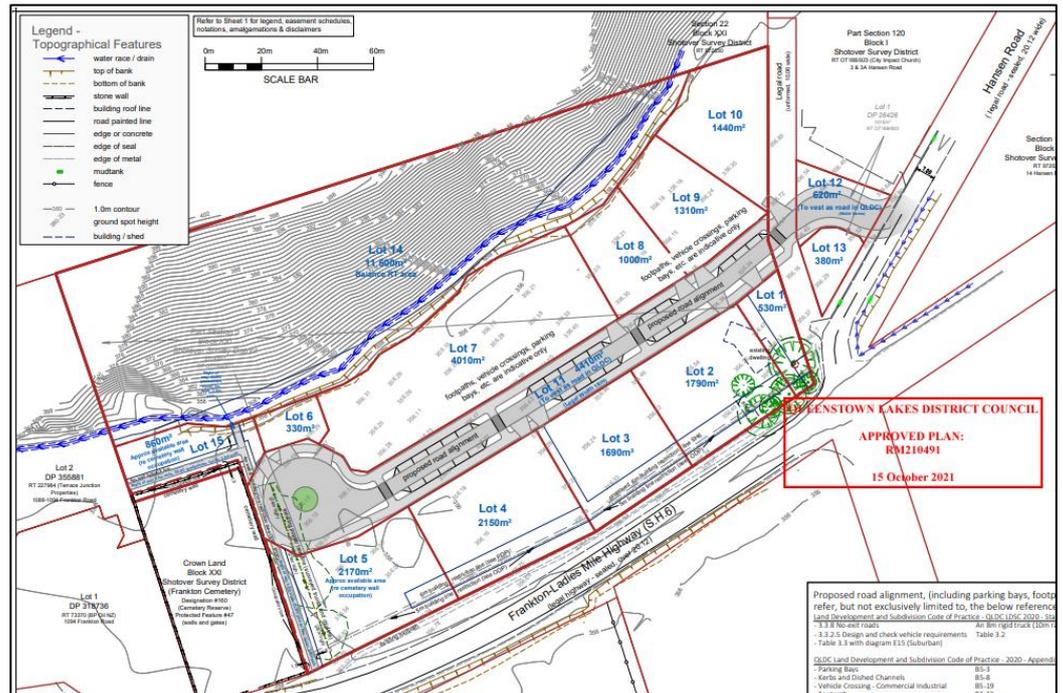
### **The Submitters**

#### *City Impact Church – OS775*

- [7] City Impact Church Queenstown Incorporated (**City Impact Church**) owns land at 3 Hansen Road, Frankton (**City Impact Church Land**).
- [8] The City Impact Church Land has an existing land use of a church, childcare facility and associated carparking.

#### *No. 1 Hansen Road – OS766*

- [9] No. 1 Hansen Road Limited (**No. 1 Hansen Road**) owns land at 1 Hansen Road, Frankton (**No. 1 Hansen Road Land**).
- [10] The No. 1 Hansen Road Land has an existing land use of a car storage facility. A 15-lot subdivision of the site has recently been completed.



**Figure 1:** No. 1 Hansen Road Land – approved scheme plan (RM161140 and RM210491)

[11] The No. 1 Hansen Road Land has the following approved resource consents that are not yet implemented:

- (a) To erect two additional floors on the existing car storage building, to provide for 32 residential units. The maximum height approved is 17.3m.
- (b) To construct a mixed-use development for temporary worker accommodation (residential activity), including 8 buildings and 476 residential units/rooms. The maximum height approved is 16.4m + 2m for ducts for Blocks A and B.

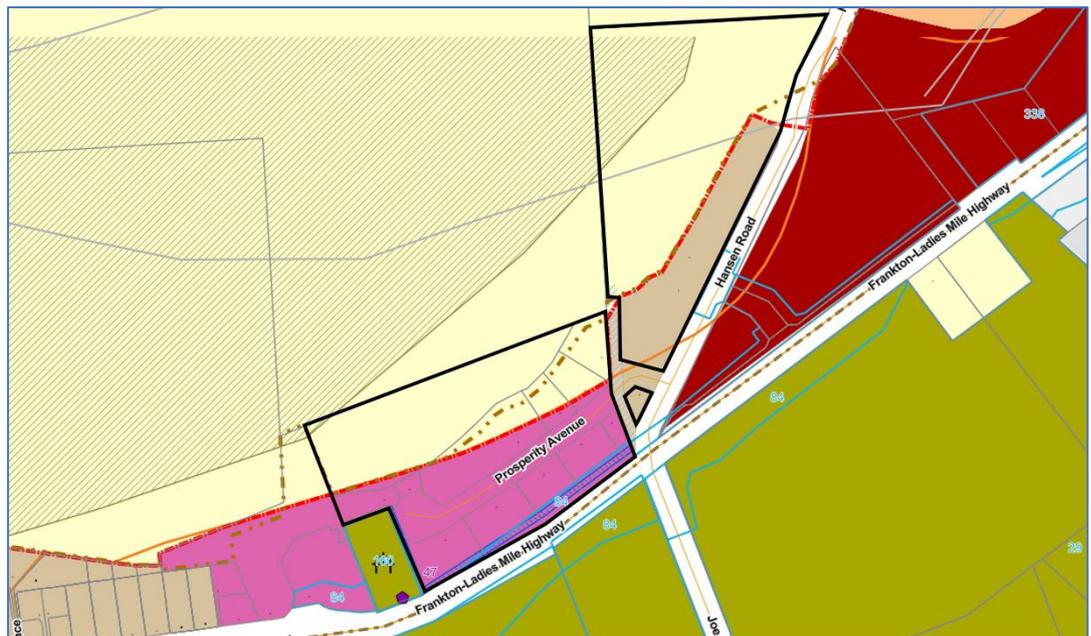
[12] At a high level, No. 1 Hansen Road intend to implement these resource consents, however, seek through the Variation to enable intensification of the site as appropriate in line with the direction of the NPS-UD.

### The Site Context

[13] The Submitters' land is located in Frankton. 1 Hansen Road adjoins State Highway 6. 3 Hansen Road is set back from the State highway. Both sites include land within the Queenstown Hill / Te Tapanui Outstanding Natural Landscape Overlay. An extract of the PDP District

Plan mapping is shown in Figure 2 below. The City Impact Church Land is zoned Rural and Lower Density Suburban Residential.

- [14] The No. 1 Hansen Road Land is zoned Local Shopping Centre zone (pink), Rural (pale yellow) and Lower Density Suburban Residential (pale brown). 1 Hansen Road adjoins the Frankton Cemetery to the west, as well as the Terrace Junction mixed use and commercial area further to the west.



**Figure 2:** PDP Zoning

- [15] The Urban Growth Boundary (red dash) and Queenstown Airport Outer Control Boundary (orange line) partially cover both sites.
- [16] The Queenstown Central and Five Mile retail and hospitality areas are located to the east/south-east of the Submitters' land.
- [17] The Frankton Centre is located to the south-west, including low-rise retail, hospitality and services, as well as housing.
- [18] The site is also in proximity to the Remarkables Park shopping area and Glenda Drive industrial/service area.
- [19] The Submitters' land is located close to the Frankton Bus Hub, as well as cycle and walking trails. Nearby recreation activities include the Frankton golf course, the amenities at the Queenstown Events Centre and Frankton Beach.

### City Impact Church submission

[20] The Summary of Decisions Requested in Submission 775 is:

Submission Point #	Summary of Submission Point / Relief Sought	S42A Recommendation
OS775.1	That the intention of the variation is supported, subject to amendments identified in this submission.	Accept in part
OS775.2	That the failure to include land at 3 Hansen Road within the proposed land to be rezoned in the variation is opposed.	Reject
OS775.3	That the urban growth boundary should be adjusted to include the northern triangle of rural zoned land that will be rezoned Business Mixed Use Zone.	Reject
OS775.4	That the increase in building height in the variation is supported.	Accept
OS775.5	That Rule 16.5.8 includes 3 Hansen Road.	Reject
OS775.6	That Rule 16.5.9.1.d. includes 3 Hansen Road.	Reject
OS775.7	That alternative relief to give effect to the submission could include amending the Frankton North Structure Plan to include BMUZ part of 3 Hansen Road within the Frankton North Structure Plan area.	Reject
OS775.8	That updating the relevant zoning map is supported.	Reject

[21] The submission was largely supported by No. 1 Hansen Road.

[22] Two further submissions in opposition were received, from Queenstown Airport Corporation (FS1355) and Arrowtown Promotion and Business Association (FS1292).

### No. 1 Hansen Road Submission

[23] The Summary of Decisions Requested in Submission 766 is:

Submission Point #	Summary of Submission Point / Relief Sought	S42A Recommendation
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OS766.1	That the general intention of the Variation is supported, subject to the amendments identified in this submission.	Accept in part
OS766.2	That the failure to include land at 1 Hansen Road within the proposed land to be rezoned in the Variation is opposed	Reject
OS766.3	That 1 Hansen Road be considered in the implementation of Policy 5 as a logical and consequential extension of the upzoning that is being proposed by the Variation.	Reject
OS776.4	That appropriate provisions be included in the Business Mixed Use Zone Chapter to enable activities sensitive to aircraft noise within the Outer Control Boundary, with appropriate restrictions to protect the Queenstown Airport such as reverse sensitivity considerations.	Reject
OS776.5	That the web mapping application used by the Council to display the district plan zones be amended to include the section of 1 Hansen Road within the Outer Control Boundary, from the Local Shopping Centre Zone, Lower Density Suburban Residential, and Rural to Business Mixed Use and that the Urban Growth Boundary be adjusted to reflect this.	Reject
OS776.6	That provisions relating to the Frankton Local Shopping Centre Zone should be changed to either a bespoke approach or a Town Centre zoning with Business Mixed Use Zone around the periphery. This approach would be supported, and either the provisions of the Local Shopping Centre Zone should be amended to suit, or consideration be given to rezone the Local Shopping Centre Zoning to Town Centre Zone for the developable area of 1 Hansen Road.	Reject
OS776.7	That residential, visitor accommodation and worker accommodation are changed to a restricted discretionary activity status or in the alternative, the rule 16.4.19 deleted in its entirety.	Reject
OS776.8	That site specific rule 15.4.3.2 requiring a Spatial Layout Plan to be submitted for any development at 1 Hansen Road is deleted in its entirety.	Reject
OS776.9	That site-specific rule 15.5.1.2 restricting building coverage to 50% is deleted in its entirety.	Reject
OS776.10	That the site-specific maximum development rule be deleted in its entirety, or if the Local Shopping Centre zoning remains, amended as follows: Development of 1 Hansen Road The following additional standards shall apply to development in the Local Shopping Centre Zone located between Hansen Road and Frankton Cemetery (as shown on the District Plan web mapping application): <del>a. the total gross floor area dedicated to retail uses shall not exceed 4000m<sup>2</sup>;</del> <del>b. the total gross floor area dedicated to office uses shall not exceed 3000m<sup>2</sup>;</del>	Reject

	<p><del>c. no retail or office activities (aside from those ancillary to permitted uses) shall take place until an upgrade of the intersection between Hansen Road and State Highway 6 has occurred;</del></p> <p><del>d. the total number of residential units (for the purposes of this rule, this shall include residential flats) shall not exceed 50 units;</del></p> <p>ea. there shall be no vehicle access directly onto the State Highway;</p> <p>fb. buildings shall be set back a minimum distance of 6m from the boundary with the State Highway; and</p> <p>gc. buildings shall be set back a minimum distance of 4m from the boundary with Frankton Cemetery.</p>	
OS776.11	<p>That rule 15.5.7 be amended as follows: Building Height</p> <p>a. for the Local Shopping Centre Zone located at Fernhill and Kelvin Heights the maximum building height shall be 14m;</p> <p>b. for the Local Shopping Centre zone located at Lake Hāwea South the maximum building height shall be 12m; and</p> <p>c. for the Local Shopping Centre Zone located at Frankton, Albert Town, Arrowtown, Hāwea, Sunshine Bay and Cardrona Valley Road the maximum building height shall be 10m, <u>with the exception of 1 Hansen Road, where the height shall be 24m.</u></p>	Reject
OS776.12	That rule 16.4.19 be deleted in its entirety.	Reject
OS776.13	<p>That rule 16.5.9 be amended as follows: Maximum building height</p> <p>16.5.9.1 Maximum building height shall be:</p> <p>a. Queenstown – 20m</p> <p>b. Wānaka – 16.5m</p> <p>c. Frankton Marina – 16.5m</p> <p>d. Frankton North – 20m</p> <p>e. 1 Hansen Road – 24m</p>	Reject
OS776.14	That the increase in building heights in Queenstown are supported.	Reject
OS776.15	That the Variation be amended as set out in the submission, alongside any alternative, additional, or consequential relief necessary or appropriate to give effect to the matters raised in this submission and/or the relief requested.	Reject

[24] Further submissions in support were received from two submitters. Queenstown Airport Corporation opposed submission points relating to rezoning of the No. 1 Hansen Road Land and the enabling of activities sensitive to aircraft noise (**ASANs**) within the Business Mixed Use zone (**BMUZ**).

### Points in Contention

[25] My evidence is focused on the following points of contention:

- (a) Rezoning of City Impact Church and No. 1 Hansen Road Land;
- (b) Removal of site-specific rules in Chapter 15;
- (c) Enabling ASANs in the BMUZ – Rule 16.4.19;
- (d) Building Height in BMUZ – Rule 16.5.9; and
- (e) Rule 15.5.7 – Building Height.

[26] This evidence will not address legal scope matters. This will be addressed through legal submissions for the Submitters at the hearing.

[27] This evidence is prepared on the basis that the rezoning requests are within the scope of the Variation, and squarely 'on' the Variation.

#### **Rezoning of the Submitter's Land**

[28] The section 42A report of Ms Bowbyes (Strategic) indicates at paragraph [9.7]:

*The rezoning of land proposed by the UIV is identified as being land close to the commercial areas in Queenstown, Frankton and Wānaka, this narrows the scope of any rezoning requests to areas that can be characterised as being close to those three commercial areas.*

[29] I consider that it makes sense to include rezoning of the City Impact Church Land and No. 1 Hansen Road Land within the Variation given the location within the Frankton commercial areas. This would align with the strategic intention of the UIV, the Accessibility Analysis conclusions, and higher order policies and objectives of the PDP, which are addressed further below.

[30] The Accessibility and Demand Analysis Method Statement in the section 32 report references Frankton at [7.2] and [7.3]:

*Generally, there is alignment of the higher levels of accessibility and demand. This analysis identifies three primary demand nodes within the District – Queenstown Town Centre, Wānaka Town Centre and Frankton Local Shopping Centre which all benefit from a concentration of land with a high relative value and proximity to a wide range of amenities.*

*The accessibility and demand analysis indicates that the spatial extent of areas where more intensive residential activities can occur could be expanded in accordance with the requirements of the NPSUD. In particular, higher levels of intensification in Queenstown around the edges of the town centre (including parts of the PC50 area), Frankton and around the edges of the Wānaka Town Centre are likely to be suitable.*

- [31] I consider that intensification is appropriate for the submitters' land, given the proximity to employment and commercial opportunities, as well as public transport and accessibility. The proposed upgrades to the SH6 roundabout and upgrades to the intersection of SH6 and Hansen Road will improve the connectivity of this area over time, particularly in terms of active transport and connections to the public transport network.
- [32] The section 32 options did include Option 3 for rezoning in the OCB, including to rezone 1 Hansen Road to BMUZ. These options are addressed in section 6.2.5 of the section 32 report and Option 3 is ranked the least favourable option.
- [33] The section 42A report of Ms Corinne Frischneckt on Rezoning: Business Zones discusses the requested rezoning in sections 5 and 6. At [6.6] Ms Frischneckt references PDP Strategic Objective 3.3.7 regarding avoidance of additional commercial zoning that is likely to undermine Frankton commercial areas.
- [34] The Economic Memo on Intensification within the Queenstown Airport OCB discussed the function of Frankton LSC in relation to commercial zones in the wider Frankton Flats (page 5, Appendix 7 of the section 32 report). The memo finds that:

*In the future, when the BMU Zone in Frankton North is fully developed, all the commercial zones in Frankton North will be contiguous and form one large commercial area with a number of precincts. The LSC will be one of those precincts. Collectively all the commercial precincts/zones will create a destination with strong 'gravitational pull' (i.e. they will likely draw from the same broad Wakatipu catchment and be the largest contiguous commercial area in the district by area and employment).*

- [35] The Economic Memo also states in relation to the existing Frankton LSC that: *“further intensification of housing in its walkable catchment would deliver a number of additional benefits for the centre compared with the status quo.”*
- [36] I consider there is potential for both submitters’ sites to be rezoned to BMUZ, to become part of the anticipated future form of one large commercial area. Rezoning of these two sites is not likely to undermine the function of either the Frankton LSCZ or Five Mile / Queenstown Central or Frankton North.
- [37] The Economic Report (Appendix 5 of the section 32 report) at 7.2.2 identifies that under the BMUZ, a more diverse mix of activities could be delivered than the status quo LSCZ, which may increase the functional amenity of the centre in the long-term. The Economic Report further considers the No. 1 Hansen Road LSCZ and indicates: *“that the change to BMU Zone in this location is likely to create a number of net additional benefits in terms of supporting further development in the centre, without compromising the ability of the locality to serve (retain) a centre role for the catchment community.”*
- [38] Option 3 was considered in the section 32 report to deliver more benefits from a community and urban form efficiency perspective than Option 2 or the Status Quo, based on the premise that the greater the share of households living in accessible areas, the greater the benefits.
- [39] The Economic Memorandum suggests this opportunity needs to be weighted against the significant economic benefits of the Queenstown Airport operations and the knowledge that the Frankton centre will continue to perform its function with or without additional households in the immediate area.
- [40] I consider that appropriate mechanisms to provide for consideration of effects on Queenstown Airport (including reverse sensitivity) can be managed through the PDP. I do not consider the proximity to the Queenstown Airport and location within the OCB to be a reason to oppose rezoning that is in line with the NPS-UD, nor strategic and higher order objectives and policies of the PDP.

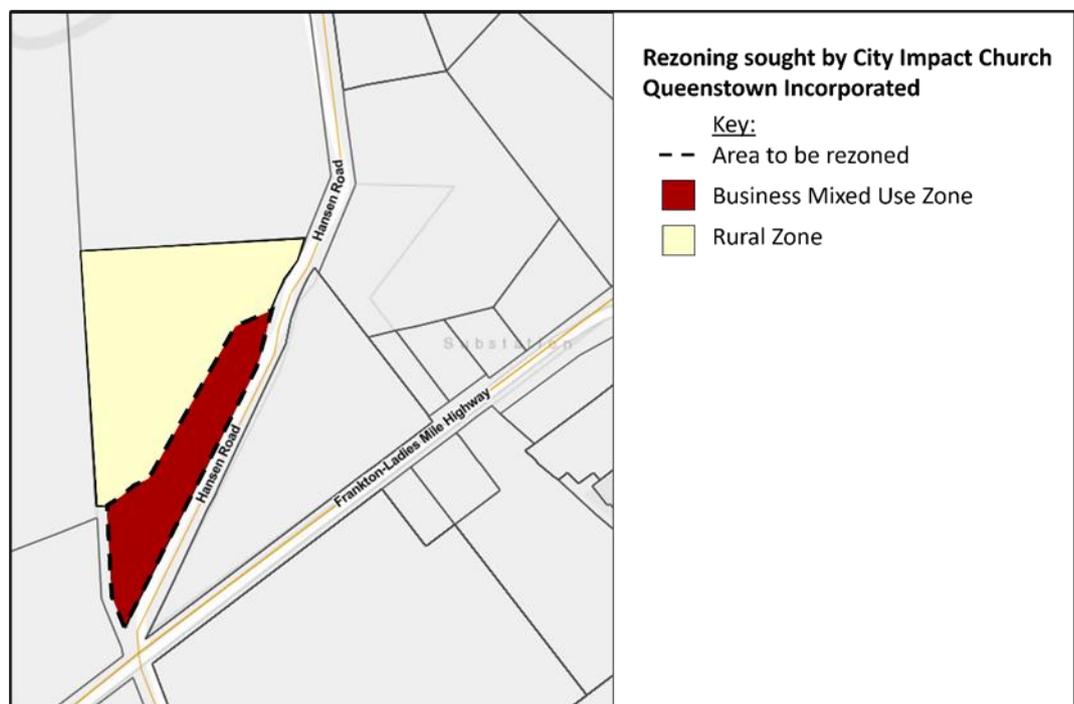
[41] The existing PDP zoning of both sites is not consistent with the surrounding zonings on any boundary. I support rezoning of each site from a planning perspective, as set out in the sections below.

### Rezoning of City Impact Church Land

[42] The section 32 options for rezoning did not include potential rezoning for 3 Hansen Road. I consider this a gap in recommended options, given Frankton was determined to be the second most accessible area in the Accessibility and Demand Analysis Method Statement (Appendix 3 of the section 32 report) and the City Impact Church land is close to commercial areas of Frankton.

[43] The City Impact Church submission sought rezoning of the City Impact Church Land to reflect:

- (a) Business Mixed Use zoning for the portion of the site outside of the Outstanding Natural Landscape overlay; and
- (b) The Urban Growth Boundary be adjusted to include the triangle of Rural zoned land outside of the ONL overlay.



**Figure 3:** Relief sought in City Impact Church submission

[44] The s42A report of Ms Corinne Frischnecht on Rezoning: Business Zones discusses the requested rezoning in section 5.

- [45] The section 42A reports of Mr Cameron Wallace and Ms Susan Fairgray both support the intensification of the City Impact Church site.
- [46] The current Lower Density Suburban Residential zoning is the only pocket of this zone within the immediate area. To the east is the Frankton North Structure Plan area, which includes a mixture of Business Mixed Use and High Density Residential zoned land.
- [47] The land between the City Impact Church Land and the Frankton North Structure Plan area is zoned Business Mixed Use. This forms a logical extension of the Structure Plan zoning in my view.
- [48] To retain the existing LDSR zoning could create an inconsistent pattern of anticipated built form, with the permitted building height in the BMUZ as notified in the Variation being double the permitted height in the LDSR zone. Given the location of the City Impact Church land away from the State Highway, at the toe of a hill, and in an accessible area, I do not consider that LDSR zoning is appropriate.
- [49] The change in zoning would enable a mixture of activities on the site. The BMUZ has a permitted activity status for activities that are not listed (i.e. commercial, residential, office/retail) that complies with the standards. Residential is still enabled (noting restriction for ASANs in Airport OCB) in the BMUZ, without density standards, therefore yield could be higher in the BMUZ. Buildings require restricted discretionary resource consent and are subject to more enabling built form standards.
- [50] The LDSR zone (as notified in the Variation) requires resource consent for residential activity exceeding one unit per 450m<sup>2</sup> and for any commercial activity. The LDSR zone has a non-complying activity status for activities that are not listed and the built form standards are more restrictive. The LDSR zone provides for typically one to two storey houses and only anticipates commercial activities that are residential compatible and small-scale.
- [51] The BMUZ provisions are more focused on the effects of built form of a site and more enabling of different activities. Given the context of the City Impact Church Land as an isolated site of LDSR zoning surrounded

by commercial zoned land, and in a highly accessible area, I consider BMUZ rezoning would be more appropriate.

*Rural zoned land outside of the ONL*

[52] The geography of the land is such that the rural triangle of land outside of the ONL overlay is not a feasible area for a rural activity to establish. The rural portion is similar in character and landscape values to the area of the site currently zoned LDSR and I consider it appropriate to adjust the Urban Growth Boundary to reflect the developable area of the site.

[53] The Business Mixed Use zoning is most appropriate, as it enables and encourages a range of uses, and would extend a logical zoning pattern across the site. This gives effect to the NPS-UD, as the zoning would allow more intensification than the LDSR zoning (even with amendments proposed in the Variation to the LDSR zone) for the same reasons as set out above in [49] – [52].

*ONL boundary*

[54] The ONL overlay boundary is currently identified through the middle of the existing buildings on the site. This is not practical, nor does it reflect a delineation in section 6(b) landscape values and character on the ground. I do not consider this area of land within the ONL contributes to the landscape values of the wider ONL. I recommend this be amended to reflect:

- (a) Landscape values and character on the ground, and taking into account the consented and modified receiving environment;
- (b) To provide for more efficient and effective outcomes for business mixed use development, which protect wider important ONL values;
- (c) To provide consistency with the mapping of this ONL boundary for other nearby properties i.e. the Frankton North area, where the ONL follows the property boundary.

- (d) To create an appropriate consenting pathway for development in this area that is consistent with strategic and higher order provisions of the PDP (i.e. chapters 3, 4, 6, and 16).
- (e) This outcome would have positive benefits that outweigh any adverse effects, including if resource consent was required for redevelopment of the existing church building and footprint.

[55] As per the recommendation of Mr Garth Falconer, I support the amendment of the ONL line to reflect the property boundary. This is a practical approach to the ONL mapping.

[56] If the ONL boundary is to move, I recommend the Urban Growth Boundary and zoning should also be amended to align with the ONL boundary.

#### *Section 32AA Analysis for Rezoning*

[57] I support the rezoning sought by City Impact Church, for the reasons above. I also support a consequential amendment to adjust the mapping of the ONL overlay. This is discussed in the Landscape evidence of Falconer for City Impact Church, and will be supported by legal submissions on scope.

[58] For completeness, I make the following comments with respect to section 32AA matters for the rezoning of the City Impact Church Land from LDSR and Rural to Business Mixed Use zone:

- (a) The recommended rezoning will more efficiently and effectively achieve the relevant objectives of the PDP, particularly Objective 3.2.3.2 as it will provide for built form that integrates well with the surrounding urban environment, including the consented activity at 1 Hansen Road and the anticipated built form in the adjacent BMUZ. The rezoning will also achieve urban development objectives SO4.22A and 4.22B, including policies i.e. 4.2.2.2 and 4.2.2.3. The zoning will reflect the appropriate land use having regard to integration with existing urban development and also enable an increased density of well-designed residential development;

- (b) The benefits are considered to outweigh the costs. There would be significant costs to rezone this land through an additional PDP review stage or seek resource consent under the current framework. Inconsistent zoning across this area of Frankton will result in an inconsistent planning framework and potential built form. There are also potential difficulties for obtaining resource consents on the site for a mixed-use development, given the current zonings; and
- (c) The failure to rezone the land or increase the height and development potential of the land will result in only partial implementation of the NPS-UD.

[59] For the above reasons, I consider that incorporation of the City Impact Church Land into the Business Mixed Use zone is more appropriate in achieving the purpose of the RMA than retaining the existing LDSR zoning, provided the BMUZ provisions are amended as discussed in paragraphs [75] – [83] below regarding ASANs.

#### **Rezoning of No. 1 Hansen Road**

[60] No. 1 Hansen Road sought the following rezoning for 1 Hansen Road:

- (a) Business Mixed Use zoning for the portion of the site outside of the Outstanding Natural Landscape overlay; and
- (b) The Urban Growth Boundary be adjusted to include the triangle of Rural zoned land outside of the ONL overlay.

[61] The s42A report of Ms Corinne Frischneckt on Rezoning: Business Zones discusses the requested rezoning in section 5.

[62] Ms Frischneckt indicates the extent of land referred to for rezoning is not clear. Ms Frischneckt is correct in their understanding in the s42A that the submission seeks to rezone the part of the No. 1 Hansen Road Land outside of the ONL, including the triangular piece of Rural land outside of the OCB. For clarity, I wish to correct the statement in the original submission paragraph 4(c) to reflect this:

*This submission point seeks that the web mapping application used by the Council to display the district plan zones be amended to include the section of 1 Hansen Road outside of the ONL~~within the OCB~~, from LSCZ, Lower Density Suburban Residential, and Rural to BMUZ (see Appendix A). The Urban Growth Boundary should also be adjusted to reflect this.*

- [63] The section 42A reports of Mr Cameron Wallace and Ms Susan Fairgray both support the intensification of the No. 1 Hansen Road site.
- [64] I consider the rezoning to BMUZ is a logical extension of the Frankton North BMUZ (as described above for City Impact Church) and will support the existing commercial centre directly to the west and south-west.
- [65] I consider that a balance can be struck between intensification in line with the NPS-UD and not compromising Queenstown Airport.
- [66] The Intensification Options in the section 32 report included options for rezoning within the OCB. Option 3 included rezoning 1 Hansen Road to BMUZ and removing constraints on airport noise (refer Appendices 7 and 8 of the section 32 report).
- [67] Section 32 analysis has been completed for the No. 1 Hansen Road (part of Option 3), with cost and benefit analysis for rezoning within the OCB in section 6.2.5 of the section 32 report.
- [68] Option 3 was considered the most efficient use of the land of the three options assessed. The section 32 report indicates *'not acting is considered to have a risk of the Council failing to meet its obligations under the NPS-UD'*.
- [69] I do not consider that the rezoning and amendment to ASANs as sought would pose undue risk to the efficient operation of the airport. The OCB includes a mixture of existing uses, including residential dwellings, which do not compromise the Queenstown Airport by default.
- [70] I consider the failure to include 1 Hansen Road in the rezoning is a missed opportunity to provide for development in an area with limited

known development constraints, high accessibility and an area that intensification could enable to provide a critical mass to enable modal shift in transport and a compact urban form. These factors are consistent with well-functioning urban environments in the NPS-UD.

[71] My view is that the missed opportunity cost and the benefits identified in the section 32 report outweigh the costs, given an appropriate consenting mechanism is implemented for development of ASANs within the BMUZ. This would both give effect to Policy 5 of the NPS-UD and the PDP objectives and policies that provide ongoing protection for Queenstown Airport.

[72] The landscape evidence of Mr Falconer addresses the location of the ONL boundary across the No. 1 Hansen Road Land. I agree with Mr Falconer that there is inconsistency in mapping of the ONL line. Mr Falconer recommends that the ONL line be amended to reflect the property boundary. I support this recommendation, with my reasoning set out in paragraphs [55] and [56] above.

[73] I support the rezoning sought by No. 1 Hansen Road, for the reasons above. I also support a consequential amendment to adjust the mapping of the ONL overlay to reflect the property boundary. This is discussed in the Landscape evidence of Garth Falconer for No. 1 Hansen Road.

[74] If the ONL boundary is to move, I recommend the Urban Growth Boundary and zoning should also be amended to align with the ONL boundary.

#### **Removal of site-specific rules**

[75] Regardless of the zoning, I consider the existing development controls for 1 Hansen Road in PDP Chapter 15 limit the efficient use of the site and are not efficient or effective in achieving the objectives of the PDP.

[76] My understanding is that transport effects on the State Highway formed part of the reasoning for site-specific rules in the PDP review process. The transport environment of the site has changed with the NZUP upgrades and realignment of the State Highway, such that the site has increased accessibility.

[77] I see no need to retain the following site-specific PDP rules:

- (a) Rule 15.4.3.2 requiring a Spatial Layout Plan to be submitted for any development of 1 Hansen Road;
- (b) Rule 15.5.1.2 restricting building coverage to 50%;
- (c) Rule 15.5.5(a)-(d) imposing maximum residential and commercial allowances.

*Section 32AA Analysis for removal of rules*

[78] For completeness, I make the following comments with respect to section 32AA matters to support the removal of site-specific rules:

- (a) The removal of these rules will more efficiently implement the direction of the NPS-UD, as it removes out of date controls that would restrict intensification of an accessible area of land;
- (b) The benefits include ease of plan administration and removal of a site-specific complexity. To remove these rules in a future plan change process would have additional costs. Given the intent of the NPS-UD, I consider removal of these rules is a logical amendment; and
- (c) As these rules apply only to the No. 1 Hansen Road Land, there are not wider implications or parties to consult that may be affected by the removal of these rules.

**Enabling ASANs in the BMUZ**

[79] Both submitters seek removal of the prohibited activity status for ASANs in the BMUZ within the OCB. This is integral to the relief sought for rezoning to BMUZ.

[80] I consider that a consenting pathway should be available for ASANs in the BMUZ. The prohibited activity status prevents a landholder from making an application for resource consent.

[81] Given advances in technology and building materials, such as acoustic insulation, I consider the resource consent process is an appropriate

mechanism for assessing built form design and management controls for sensitive activities/uses as required and ensuring suitable noise attenuation, rather than avoiding development on highly accessible and suitably zoned land for development.

- [82] Consented activities within the OCB, including at 1 Hansen Road, have determined that sensitive activities i.e. residential, can be appropriate within the OCB with sufficient management.
- [83] Removing the prohibited activity status would enable both intensification of land within Frankton as an accessible area (in line with the direction of the NPS-UD) and encourage mixed use activities throughout the OCB, which could result in positive urban design outcomes.
- [84] A resource consent pathway for activities sensitive to airport noise within the OCB would be consistent with the Strategic Policies and Objectives related to the Queenstown Airport and development at Frankton i.e. Strategic Policy 3.3.6 and Strategic Objectives 3.2.1, 3.2.1.3 and 3.2.2.1. A consenting pathway would also be consistent with Objective 4.2.2 A, providing a process to assess the potential adverse effects of a proposal on Queenstown Airport.
- [85] I would expect that any consenting pathway would include requirements for maintaining sound insulation and mechanical ventilation requirements for land within the OCB.
- [86] A consenting pathway is available for buildings within the OCB in the LDSR zone, i.e. the City Impact Church Land existing zoning through PDP Rule 7.5.4. This rule could similarly be implemented for the BMUZ.
- [87] I support a deletion of Rule 16.4.19, or a change to a non-complying activity status.

### **Height Rules for BMUZ**

- [88] The height limits in the BMUZ in the Variation are 16.5m permitted height and 20m maximum height.

- [89] City Impact Church supports the height limits proposed, with inclusion of 3 Hansen Road in the maximum height limit of 20m for Frankton North (Rule 16.5.9.1 d).
- [90] No. 1 Hansen Road supports the 16.5m permitted height limit. No. 1 Hansen Road sought a maximum of 24m for 1 Hansen Road (addition to Rule 16.5.9.1).
- [91] As recommended in the evidence of Mr Garth Falconer, a height of 24m would be appropriate for the City Impact Church Land and the No. 1 Hansen Road Land.
- [92] Mr Cameron Wallace states at paragraph [12.1] in the Urban Design s42A report that: "*Generally speaking, the BMUZ is located in areas with moderate to high levels of accessibility and are suitable to enable heights and densities consistent with that provided for in the HDRZ.*"
- [93] I agree with the above statement from the Mr Wallace, and consider the Submitters' land is appropriate for additional height, without a set maximum height limit. Removal of the maximum height limit would be consistent with the approach in the HDR zone in the Variation.
- [94] If a maximum height limit is deemed necessary, I consider 24m would be more appropriate, reflecting the permitted height limit in the Queenstown Town Centre in the Variation.
- [95] The resource consenting pathway for non-compliance with permitted height limits in the Queenstown Town Centre zone is restricted discretionary, as well as for the HDR zone where a maximum limit is not specified.
- [96] I have made the same recommendations in evidence for Submitter 768, Latitude 45 Development Limited, relating to BMUZ in Frankton North and defer to that evidence in respect of support for these amendments.

### **Height Rules for LSCZ**

- [97] No. 1 Hansen Road sought alternative relief of a 24m height limit in Rule 15.5.7 in the instance that the existing LSCZ zoning is retained for the No. 1 Hansen Road Land.

- [98] The Variation as notified proposes the LSCZ height limit for Frankton be 10m.
- [99] The s42A report of Corinne Frischneckt for Chapter 15 considers the LSC height rule for Frankton in paragraphs [8.30] – [8.34].
- [100] Ms Frischneckt refers to the Airport Approach and Take-off Surfaces and Transitional Surfaces designations near to the No. 1 Hansen Road Limited land. The site is not located within it (Figures 12 and 13 of Ms Frichneckt s42A report at [8.32]).
- [101] The LSCZ provisions include Rule 15.5.4 for acoustic insulation for development within the OCB – with a non-compliance activity status of non-complying.
- [102] For the reasons set out above regarding a 24m maximum height limit, I support this relief sought.

#### **Further Submissions – In Support**

- [103] City Impact Church and No. 1 Hansen Road both made further submissions in support of the following submitters.

##### *Waka Kotahi, NZ Transport Agency – OS200*

- [104] The Submitters agree with Waka Kotahi that Frankton should be considered for greater density of development given it is identified as the second most accessible area within the District.
- [105] I agree with Waka Kotahi that there is more development potential in Frankton than provided for in the UIV as notified.
- [106] My reasoning for rezoning of the Submitters' land to better enable intensification is addressed in my evidence above. My view is that increased rezoning and height will better give effect to the NPS-UD, particularly Policy 5, in Frankton. These sites are relatively undeveloped so should have greater weighting for intensification.

#### **Further Submissions – In Opposition**

##### *Brett Giddens on behalf of Queenstown Airport Corporation – OS822*

- [107] Both submitters made a further submission opposing points of Queenstown Airport Corporation's submission, relating to height, subdivision and prohibited activity status for activities sensitive to airport noise within the Outer Control Boundary (**OCB**) among other things.
- [108] In relation to ASANs within the BMUZ, I have provided my reasoning to support removal of the prohibited activity status in my evidence above.
- [109] I consider that a consenting pathway should be available for sensitive activities, rather than a prohibited activity status.
- [110] I do not agree with the 10m and 12m building heights sought by Queenstown Airport Corporation for the OCB. I have set out my reasons for increasing height limits in my evidence above, including for sites within the BMUZ and LCSZ within the OCB.
- [111] For these reasons, I oppose the relief sought by Queenstown Airport Corporation.

### **Conclusions**

- [112] I consider that increased height and rezoning within the Frankton area as set out above will achieve a more effective and effacing zoning outcome, and greater alignment with the requirements of Policy 5 of the NPS-UD. This includes rezoning of the No. 1 Hansen Road Land and the City Impact Church Land to increase development potential.
- [113] I support the adjustment of the ONL boundary to reflect the Landscape values and character present on the ground as set out in the evidence of Mr Falconer, consistent with Chapter 3 and 6 policy direction, and section 6(b) RMA.
- [114] Rezoning of the Submitters' Land will increase consistency in the Frankton planning framework and anticipated resultant built form. Failure to include this land in the rezoning will result in less intensification in an area identified as high accessibility and demand and a greater opportunity cost.
- [115] I consider that the benefits of removing a maximum height limit, or increasing the maximum height limit for the land, in both the BMUZ and

the LSCZ, outweigh the costs. There are administrative efficiencies to be gained in a more streamlined process, particularly given the Frankton area is an area with opportunities for growth.

[116] I support removal of the prohibited activity status for activities sensitive to airport noise in the OCB. I consider a consenting pathway is appropriate for making decisions on specific applications, and I do not otherwise consider reverse sensitivity concerns to be a reason for opposing the increased height limits sought, consistent with strategic objectives 4.2.2A and 4.2.2B for compact, integrated and well-designed urban form.

Dated: 4 July 2025

A handwritten signature in blue ink, appearing to read 'Charlotte Clouston', is positioned above a dotted line.

.....  
Charlotte Clouston

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991

**IN THE MATTER** of submissions and further submissions  
of the QLDC Proposed District Plan –  
Urban intensification variation

**BY** **CITY IMPACT CHURCH**  
**QUEENSTOWN INCORPORATED**

Submitter 775

**NO. 1 HANSEN ROAD LIMITED**

Submitter 766

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**STATEMENT OF EVIDENCE OF GARTH FALCONER**

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Dated: 4 July 2025

## **STATEMENT OF EVIDENCE OF GARTH FALCONER**

### **Introduction**

- [1] My full name is Garth James Falconer. I am an urban designer and landscape architect and the founder and director of Reset Urban Design Limited (“**Reset**”), a specialist urban design and landscape architecture practise based in Takapuna and in Wānaka. I hold a Bachelor of Arts from Auckland University, a Post Graduate Diploma in Landscape Architecture from Lincoln University and a Master’s Degree in Urban Design from Oxford Brookes University (UK).
- [2] I am a Fellow of the New Zealand Institute of Landscape Architects Tuia Pito Ora and a member of the Urban Design Forum. I have been a member of the Auckland and Queenstown Urban Design Panels and a Hearings Commissioner for Auckland Council. I have also formally reviewed the residential chapters of the Proposed District Plan for the Queenstown District Council.
- [3] I have been practising for 36 years, the first twenty years as a founding director of Isthmus Group before forming Reset in 2008. I have masterplanned and detail designed a wide range of settlements and residential and commercial developments across Aotearoa New Zealand. I have been part of the design team that has worked on the subdivision consent and development plans for One Hansen Road including both landscape and urban design reports for the Fast Track Consent.
- [4] Reset has won many New Zealand Institute of Landscape Architects awards and also has won four International Federation of Landscape Architects Awards for the Asia Pacific region. I have lectured across many universities and have authored two published books on the history of urban design and landscape architecture in New Zealand.

### **Code of Conduct**

- [5] I confirm that I have read the Code of Conduct for Expert Witnesses. To the extent that my evidence is of my opinions, I agree to comply with the Expert Code. I understand and accept that it is my overriding duty in this

proceeding, where I give evidence of my opinions, to assist the Court in matters that are within my expertise.

[6] I confirm that any opinions I give are within my area of expertise and experience.

### **Scope of Evidence**

[7] I am familiar with City Impact Church Queenstown Incorporated (**City Impact Church**) and No. 1 Hansen Road Limited's (**No. 1 Hansen Road**) submissions on the Queenstown Lakes District Council (**QLDC**) Proposed District Plan (**PDP**) – Proposed Urban Intensification Variation (the **Variation**) and their respective interests in land at 1 and 3 Hansen Road.

[8] I have been instructed by John Edmonds & Associates to review urban design and landscape matters in the submissions by No. 1 Hansen Road and City Impact Church to the Queenstown Lakes Proposed District Plan 2023 – Urban Intensification Variation. Also I have been instructed to review the application, Councils Section 42a report and urban design assessment by Mr Cam Wallace, and the applicant's further information

[9] My evidence will address the following:

- (a) Context and Proposal;
- (b) Section 42a Review
- (c) Response
- (d) Conclusion.

### **The Context and Submission**

[10] The two sites 1 and 3 Hansen Road are located adjacent to each other in Frankton, close to the central village and to the Frankton Ladies Mile Highway/ State Highway 6 as it heads north.

[11] The two sites share a similar strong landscape form being mainly flat and backed by a steep hill. The flat areas are highly modified, partially developed whilst the hill which rises approximately 143m is clad in mixed

regenerating bush. At the foot of the hill through both sites runs a water course which was originally formed for sluicing for gold in the nineteenth century.

- [12] The larger of the two sites, 1 Hansen Road, is adjacent to the historic Frankton Cemetery and forms a broadly rectilinear lot of 3.4 hectares roughly 250 m long and 100m wide from the water course to the boundary with the State Highway. Opposite is the large public open space and recreational reserve incorporating the Queenstown Event Centre. The site is currently being developed with a newly constructed 5 level car storage building and central access road that comes off a single entry from recently realigned Hansen Road intersection and NZTA extension works on the State Highway and roundabout.
- [13] Immediately to the north is the site at 3 Hansen Road which set back from the SH6 and is a long stretched triangle in form extending 200m by 50m from the watercourse. On the site there is a centrally positioned two level Church building and an adjacent Childcare Centre. There are two entries to the site, directly off Hansen Road and into a large open car park. Opposite is the Country Lane Retail Village consisting of a collection of commercial retail outlets.
- [14] The two sites fit into the general area of large-scale urban development that is very much evident with major current construction. This is part of the long planned transformation into a major urban corridor that extends along SH6 to the Frankton metropolitan centre.
- [15] In terms of planning, both sites share a complicated background of what are allowable land use activities and development. Both fall within the Urban Growth Boundary and are close to urban centres. Through the Operative District Plan that has been in place prior to the transformation and the Proposed District Plan which is informed by a raft of more recent intensification plans and policies notably the Queenstown Lakes Spatial Plan 2023, the National Policy Statement on Urban Development 2020, as well as the Frankton Structure Plan 2022.
- [16] The flat area of the site at 1 Hansen Road has, under the ODP, been largely zoned Local Shopping Centre (**LSCZ**) except for a small rural

General zoned triangular section. There is over this area an additional overlay from the Airport Outer Control Boundary (**OCB**). The line of Outstanding Natural Landscape (**ONL**) overlay which extends across the hill runs along the base of the hill broadly following the watercourse.

- [17] A subdivision plan for a central access road and 12 lots was granted in 2021 under which the large car storage building and cul de sac road have been formed. In 2024 a Fast Track consent was granted for eight separate buildings between 11.8m and 16.4m.
- [18] The current submission seeks to rezone the entire site outside of the ONL as Business Mixed Use zone with the UGB to be slightly adjusted and several site specific development controls be revised including the height control be lifted to 24m (see planning submission for more detail), or otherwise with no maximum.
- [19] The site at 3 Hansen Road has under the ODP been largely zoned Low Density Residential with a small area at the tip of the site zoned Rural General. Subsequently a relatively large church building and childcare centre with expansive car parking have been constructed centrally on the site circa 2010. As what appears to be a mapping anomaly, the current ONL passes through the built Church.
- [20] The submission proposes to rezone the 3 Hansen Rd site entirely to BMU. The height provisions are proposed to be 20m.
- [21] Since the submissions were lodged, an additional point has been raised to assess mapping consistency of the ONL. Previously the ONL has only been mapped at a high level with differing interpretations on whether the exact line should follow the change in topography or the line of the historic watercourse. Based on aligning ONL line with adjacent properties extending along the back of the Frankton Village an additional proposal is to shift the ONL to the northern boundary of both the properties which would provide a clear definition.
- [22] Both submissions on the adjoining sites have proposed zoning and planning controls that allow increased residential and commercial development to provide for greater efficiency for land that is centrally

located. Each site is well accessed, close to public transport and employment and relatively easy to develop.

### **Section 42A Review**

- [23] The Council's s42a report (6 June 2024) on the Proposed Urban Intensification Variation to the PDP has made recommendations specifically on the two submissions for 1 and 3 Hansen Road.
- [24] The s42a report by Council's planner Ms Corrine Frischknecht has also relied on expert evidence including urban design from Mr Cam Wallace (6 June 2025).
- [25] Noting that on the 1 Hansen Road site the rural zoned land is not assessed in the report as it lies outside UGB and hence is not considered part of the Urban Intensification Variation (**UIV**). I defer to legal submissions in respect of issues as to scope.
- [26] In assessing the proposed rezoning to BMUZ Ms Frischknecht considers the subdivision and the Fast Track plans on 1 Hansen Rd to be part of the existing environment (5.11).
- [27] Across both sites referring to Mr Wallace's urban design evidence the section 42a reports acknowledges that the two sites achieve a high degree of accessibility and given Frankton's future role as a metropolitan centre: *"does not consider that it would give rise to any problematic urban design issues (e.g. amenity). Rather he says its provides an opportunity to intensify (either residential or commercial) uses in an are close to employment, services and public transport"* (p10 Section 42a report).
- [28] Ms Frischknecht also recognises that Frankton's role as a metropolitan centre in the Queenstown Lakes Spatial Plan 2021-2050: *"identifies it fulfilling a more important centre role than other LSC Zones"* (5.5).
- [29] However, in regard to built form, Ms Frischknecht has some reservations in supporting the submissions specifically concerning the landscape effects on the ONL and the submissions proposal to align the maximum height to 24m to align with that proposed for Queenstown Town Centre. Referring to earlier concerns during the Fast Track process of views of

the ONL and in the distance the Crown Range ONL Ms Frischknecht notes that no landscape assessment has been provided as part of the submission. Her concerns are similar for the submission on 3 Hansen Rd.

- [30] The secondary proposal that the 1 Hansen Road site be zoned Town Centre Zone Ms Frischknecht opposes this largely on traffic and OCB concerns. And she does not agree with alignment of Frankton as a town centre which seems odd as it is deemed a metropolitan centre under the Spatial Plan and PDP (a fact she acknowledges see 5.5).

### **Response**

- [31] The landscape concerns expressed in the section 42a are relatively restricted and relate to visual issues with the adjoining ONL. It appears the submission was considered without reference to the earlier work in the subdivision and Fast Track consents which have been recently completed and determined that the combined landscape and visual effects of the proposed development of 1 Hansen Rd were low.
- [32] As both the sites are adjoining and have very similar characteristics, their assessment should be regarded as one.
- [33] Reset have been working on the design and development of 1 Hansen Rd since 2021.
- [34] We prepared a landscape and visual effects assessment (**LVA**) for the Car Storage and Commercial Building (15<sup>th</sup> May 2023) Variation to an approved Resource Consent application (RM211006). The proposed variation sought to include an additional storey of commercial/office space within the approved car storage building.
- [35] We prepared a LVA for the Fast Track Consent (24<sup>th</sup> October 2023).
- [36] The LVA was prepared adopting the methodology Te Tangi a te Manu: Aotearoa New Zealand Landscape Assessment Guidelines (Te Pito Ora/NZILA July 2022).
- [37] The LVA report describes the outcomes of the assessment of effects in order to provide an understanding of the existing landscape and how the

proposed development may potentially affect that landscape, its character and visual amenity. Also the report considered the appropriateness of the development as a whole on the receiving environment, and the potential effects the development has on the adjacent ONL.

- [38] In undertaking this assessment, the location of the proposal and its surrounds were visited and analysed to understand existing landscape values and character as well as the physical and visual relationship the area has with the surrounding built and natural environment. The likely visual catchment, viewing audiences, and representative viewing locations have also been identified and considered.
- [39] The LVA included visual simulations from 6 Viewpoints, the location of which were agreed with Council.
- [40] The proposed development on 1 Hansen Rd involves constructing and operating a mixed-use development of 8 buildings (between 10 and 18 metres high). The overall building bulk and mass has been carefully distributed within the site to provide generous building separation, boundary setbacks and a range of interface conditions.
- [41] Buildings at the northern end of 1 Hansen Rd abutting the boundary with 3 Hansen Rd are proposed to be 5 levels.
- [42] Overall, both the sites are viewed within a mixed residential and commercial urban context of Frankton Village, where built form is typical and expected. Clear visibility of the Site is limited and generally contained to close vantage points along the SH6 corridor or immediately adjacent land.
- [43] It is considered that the urban form of the proposed development would be in keeping with the existing and developing urban context, that expected of the zoning and relevant spatial plans and masterplans for the area.
- [44] It is our opinion that the Site and surrounding context is capable of accommodating such a proposal and contributing to a positive urban form along the SH6 road corridor. It is considered that as the level of

sensitivity of the Site to visual change is generally low, the mitigation measures of the design applied to the building are effective at reducing impacts and the overall adverse effects of the proposal on the landscape and visual amenity are considered to be an acceptable change within the surrounding environment.

- [45] Combining both the landscape and visual effects of the proposed development it is concluded that the overall effects will be Low, and the proposed development will positively contribute to the future urban environment of Frankton.
- [46] Following the submission of the LVA we formed a response to the extensive peer review prepared by Anne Steven Landscape Architects (**ASLA Ltd**) dated 27 May 2024.
- [47] Ms Steven noted that she believes the original assessment relies too heavily on the non-statutory future metropolitan vision and the other urban areas within the Five Mile future corridor to justify the effects ratings. I believe this concern primarily relates to issues regarding building heights.
- [48] The Site sits between the existing Frankton Village (10m height) and the future development along the Five Mile Urban Corridor (20m height). The land to the east of the Site, fronting on to the SH6 Frankton-Ladies Mile Highway for approximately 1.3km, is zoned as Business Mixed Use with possible building heights of 20m.
- [49] Further, the views taken by Ms Frischknecht in the S42a, with regards to landscape effects, are largely informed by the findings and decisions of the Fast Track Expert Consenting Panel for the 1 Hansen Road Worker Accommodation project, which were in turn informed by Ms Steven's landscape peer review.
- [50] In para 5.12 of the S42a report, Ms Frischknecht states that: *"Given that views of the ONL and the distant Crown Range ONL (in particular, as people travel along the short part of SH 6 from the Frankton roundabout), were considered key issues in processing the fast track consent, I am not convinced that a greater height in this location is appropriate"*.

[51] In the Record of Decision of The Expert Consenting Panel for 1 Hansen Road Worker Accommodation, Ms Steven is noted as providing comments that: *“The lower height of Blocks D and H reduces the “visual blocking” of the ONL behind, but this is not of great concern given the vast majority of the ONL hill landform is visible above”<sup>1</sup>*. Therefore, one must conclude that given views to the distant Crown Range ONL is specifically highlighted in Ms Frischknecht’s commentary, the height in relation to this view is of primary importance.

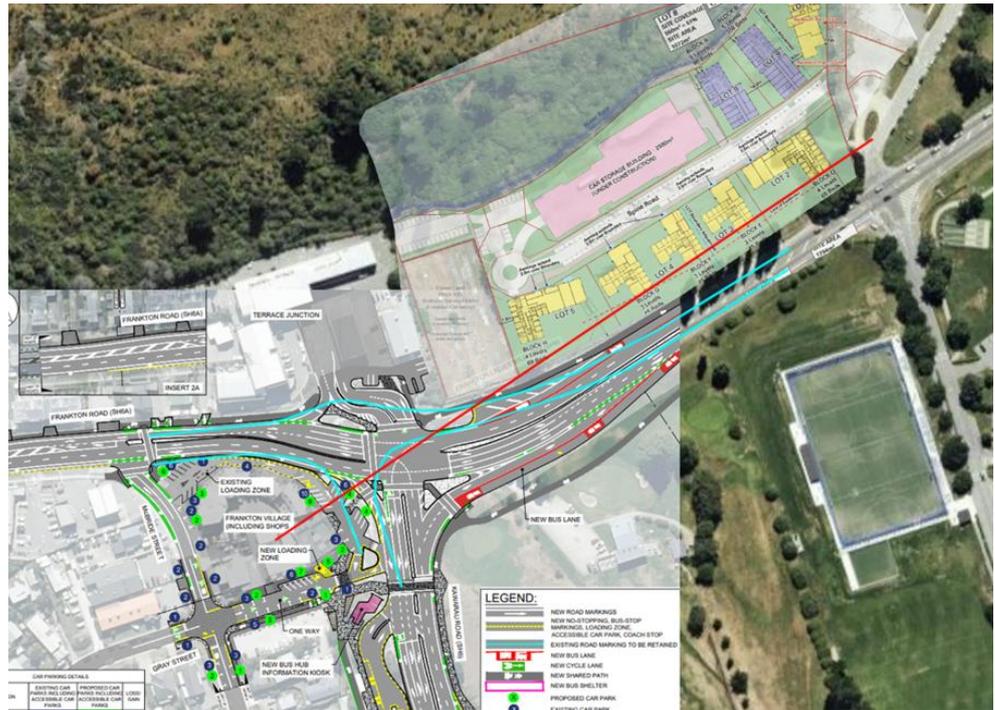
[52] In the response to Ms Steven’s peer review several points were articulated including:

- (a) Long range views to the Crown Range ONL would be retained,
- (b) Buildings would be set back from SH6, maintaining this view corridor.
- (c) The planned intersection upgrade works would significantly alter the approach and exit angle for people travelling along SH6, through the intersection and past the subject site – therefore changing the potential perceived visual effect on distant views to the Crown Range ONL and Ben Lomond ONL.

[53] Figure 1 below depicts an overlay of the current road alignment (cyan lines), with the proposed new intersection alignment, and the current 1 Hansen Rd building setback (red line).

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<sup>1</sup> Record of Decision of The Expert Consenting Panel for 1 Hansen Road Worker Accommodation. Page 27 [127] (b)



**Figure 1 - Frankton intersection**

[54] It appears evident that the proposed buildings in the Fast Track Consent application would likely not impede distant views of the Crown Range ONL *“In particular, as people travel along the short part of SH6 from the Frankton roundabout”* (underscored by author for emphasis) due to the proposed building setbacks from the highway corridor and the orientation/angle of the proposed roading infrastructure. Therefore, in my opinion the maximum height of these buildings should not be determined by perceived views from the short part of SH6 from the Frankton roundabout for the following reasons:

[55] People are travelling along SH6 at a busy intersection with several foreground elements within the view including signage, light signals, street lights, etc (the view experience would be transitory and lasting only for a short period of time).

[56] A short part of the greater SH6 corridor is being considered. The site frontage is approx. 200m in length, however the length vehicles would not be perpendicular to the built form, and thus views not impeded, is markedly less.

- [57] People travelling from the intersection west, towards the Crown Range, are orientated out further south, past the existing road alignment and therefore better orientated along the SH6 axis view corridor and further away from built form.
- [58] It is my opinion that building setback is more directly related to preserving the visual connections along SH6 than building height and that the surrounding landscape has the capacity to absorb the additional height proposed in this latest submission.
- [59] Queenstown Hill/Te Tapunui forms part of a larger area of Outstanding Natural Landscape zoning (Western Wakatipu Basin ONL) that extends from Frankton through to wider Queenstown, encompassing the steep south-eastern mountain slopes of Te Taumata o Hakitekura (Ben Lomond), the steep south and eastern mountain slopes of Bowen Peak and the two elevated roche moutonnée landforms of Te Tapunui (Queenstown Hill and including Sugar Loaf). The ONL area has several important features including engaging and attractive short to long-range views from the Frankton Arm, Frankton (including the airport), SH6/6A, and Kelvin Peninsula to the smoother southfacing slopes of Te Tapunui (Queenstown Hill).
- [60] Within 21.22.12 PA ONL Western Whakatipu Basin: Schedule of Landscape Values particularly important views to and from the area are identified and described. Of note, with relevance to Frankton and the submission sites are:
- (a) Para 79. *The bold contrast between the urban development throughout the lower flanks of the hill and the elevated wooded slopes is memorable and of importance to the identity of Queenstown as a settlement tucked into the base of a mountain.*
  - (b) Para 83. *The almost unbroken patterning of vegetation (plantation forest along the southern flanks of Te Tapunui (Queenstown Hill) and wilding conifers intermixed with grey shrubland and scrub throughout the southern lower flanks of Pt 781, together with its generally undeveloped character, forms a memorable contrast with the urban development below and the more open pastoral*

*slopes sitting above, which reinforces the impression of coherence.*

- [61] Due to the scale and extent of the immediate and wider surrounding landscape setting (in particular the overall scale and height of Queenstown Hill/Te Tapunui), the landscape has the ability to accommodate the proposed height without undue consequences to surrounding landscape character. The hill slope behind the sites will provide a high amenity back drop in perpetuity, particularly if the zoning remains as Rural/ONL.
- [62] The overall scale of the background landscape ensures that the key features of Queenstown Hill/Te Tapunui (ONL) are retained and will not be impacted by the proposed additional height. Due to the scale and expanse of the surrounding landscape, the key characteristics of the landscape remain intact with limited aesthetic or perceptual change being apparent. The identified ONL will continue to maintain its existing character, sitting as a backdrop to the existing and future proposed urban growth in Frankton. The ONL will remain legible and of prominence in the wider landscape, reinforcing the character and contrast of the natural alpine environment with urban built form.
- [63] Additional height on the City Impact Church site is considered to be equally, if not more, suitable given the site's location, being well set back from the SH6 corridor and tucked in further north east and behind the PDP BMUZ land. The stepping of heights from front to rear of the site<sup>2</sup> was noted by Ms Steven as a positive outcome for 1 Hansen Road providing a back drop by taller buildings. Given the potential height of the BMUZ fronting SH6 it is also considered appropriate that the City Impact Church, to the rear, has a similar height to avoid a 'tall front and short back' scenario.
- [64] Regarding the line of the ONL, Ms Steven agrees that *"the ONL reflects a lack of ground truthing to accurately determine the line as it is my*

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<sup>2</sup> Record of Decision of The Expert Consenting Panel for 1 Hansen Road Worker Accommodation. Page 27 [127] (a)

*understanding that it should follow the base of the slope and not include any of the flat land”.*

- [65] The small triangle of Rural zoning on the 1 Hansen Road Site does not display any of the characteristics one would identify with the rural zoning or with the character and values consistent with the ONL. On site the differentiation between Rural and LCSZ is not distinguishable.
- [66] In her review Ms Steven choses to focus on ONL issues and notes that: *“the more relevant assessment matter is the effect of the development being in such close proximity to and sitting right in front of ONL or in viewshafts of ONL, related to the values articulated in the RUD LAV and in Schedule 21.22.12”.*
- [67] Buildings in front of the ONL on the Site itself only prevent visual access to the lower portion of the ONL, which makes up a small percentage of the overall extensive ONL as shown in the visual simulations and Ms Stevens own photographs. There are no significant characteristics, attributes or values to the lower part of the ONL (with only mixed quality vegetation) and would argue that the upper portion contour and land form contribute more to the overall qualities of this portion of ONL.
- [68] Considering the additional matter of the location of the ONL, it has been mapped by different experts topographically and culturally.
- [69] It appears that the most consistent approach is to define the ONL on the uphill boundary of both properties and extend the BMU to this boundary.

### **Urban Design**

[70]

I have reviewed the urban design evidence of Mr Wallace. I agree that more intensive use of both sites would not give rise to a loss of amenity. These are large accessible sites that are great opportunities for innovative residential and commercial development. The zoning sought in the submissions for BMU and adjustment of the Urban Growth Boundary is appropriate in light of the consented activity, the central and accessible location

### **Conclusion**

- [71] The two sites adjoin each other, share the same landscape attributes and development potential.
- [72] QLDC's section 42a report largely recognises the urban transformation occurring as the area develops towards the planned metropolitan centre the submission is supported on urban design grounds being close to the centre, highly accessible, no loss of amenity issues and presenting an opportunity to increase efficiency in providing residential housing and commercial uses.
- [73] The only landscape concern from the section 42a report was that of possible visual effects on the ONL.
- [74] Referring to the LVA that was comprehensively prepared, peer reviewed and accepted by the Fast Track Consenting panel - The location of the ONL has been mapped differently and is inconsistent i.e. base of the hill and along the watercourse, with ONL identification for adjacent and nearby properties in Frankton North, which have adopted a practical ONL boundary in the circumstances. The simplest location would appear to be along the property boundary.
- [75] Taking the same approach in this instance will reinforce that zoning pattern and protection of important wider ONL values.
- [76] Overall, in my opinion, the submission including the increased height provisions provides consistency with the existing and anticipated environment whilst providing greater efficiency in providing increased residential and commercial opportunities in an area that is well serviced by public transport easy to access and hence I support the submission on landscape and urban design grounds.

Dated: 4 July 2025

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

.....  
Garth Falconer