

**BEFORE THE INDEPENDENT HEARING PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

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| Under the | Resource Management Act 1991 |
| In the matter | of the Urban Intensification Variation to the proposed Queenstown Lakes District Plan |

**REBUTTAL EVIDENCE OF CAMERON WALLACE
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

URBAN DESIGN

24 July 2025



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1. QUALIFICATIONS AND EXPERIENCE

1.1 My full name is Cameron Wallace.

1.2 I prepared urban design evidence for Queenstown Lakes District Council (**QLDC** or **Council**) dated 6 June 2025 (**EiC**) on the Urban Intensification Variation (**UIV** or **Variation**).

1.3 My qualifications and experience are set out in my EiC at paragraphs 1.2 to 1.5.

1.4 Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

2. SCOPE OF REBUTTAL EVIDENCE

2.1 My Rebuttal Evidence is provided in response to the following evidence filed on behalf of various submitters, as far as it relates to or raises urban design matters:

- (a) Paula Costello for multiple submitters;
- (b) David Compten-Moen for Coherent Hotel Limited, Continuum Hotel Limited and Queenstown Gold Ltd (765, 771 and 773); Reid Investment Trust (878);
- (c) Roland Harland and Vicki Jones for Alistair Hey, Carl Smiley, Barbara Jarry, and Duncan and Teija Boscoe (281, 581, 651 and 1386);
- (d) Tim Williams for Matt Laming (449);
- (e) Charlotte Clouston for Acorn Mountain Trustees Limited, Clearwest Trustees Limited, Oak Wood Trustees Limited, St Marthas Trustees Limited, J F C Henderson (Collective) (779); and
- (f) Charlotte Clouston for Coherent Hotel Limited, S Haines and M Spencer, D and M Columb, and S and R Millar (773, 1348, 1349 and 1350).

2.2 I have also read and considered the following statements of evidence and have taken them into account in preparing my rebuttal evidence, but consider no specific response is necessary:

- (a) John Edmonds for Scenic Hotel Group Ltd, Queenstown Residential Group Ltd (763 and 764);
- (b) Jason Rhind for Alistair Hey, Carl Smiley, Barbara Jarry, and Duncan and Teija Boscoe (281, 581, 651 and 1386);
- (c) Tim Williams for Willowridge Developments, Orchard Road Holdings Ltd and Three Parks Properties Ltd (948); and
- (d) Carey Vivian for Ian Farrant, Lady Eleanor Skeggs, Julie and Bruce Steenson, Maria Young, Marie and Warwick Osborne, John and Judy Young, Prue Hendry (1057, 1058, 1131, 1132, 1134, 1135 and 1233).

2.3 I participated in Expert Witness Conferencing on 15 July 2025 which produced the Urban Design Expert Witness Statement dated 16 July 2025. In summary:

- (a) This conferencing was focussed on the application of proposed recession planes on sloping sites (as defined within the PDP) within the Lower Density Suburban Residential Zone (**LDSRZ**) and Medium Density Residential Zone (**MDRZ**);
- (b) It was agreed that it would be appropriate to return to the PDP provisions for sloping sites with the inclusion of a limitation applying to accessory buildings (which are permitted to infringe on boundary setback requirements); and
- (c) It was agreed that it would be appropriate to provide for a bespoke recession planes along the southern boundary of sloping sites in the MDRZ.

2.4 Where I do not respond to a particular evidence statement, or general theme, this does not mean I have not considered the subject matter, but that I have nothing further to add and my views remain as expressed in my evidence in chief.

2.5 The “Rebuttal Recommended Provisions”, as recommended in Council’s rebuttal, is included at Appendix A to Ms Bowbyes’ Rebuttal Evidence.

3. EXECUTIVE SUMMARY

3.1 Material issues raised in evidence filed by submitters are:

- (a) The potential restrictions on development across both the LDSRZ and MDRZ from removal of specified exclusions to recession plane standards on sloping sites – particularly those that are south facing;
- (b) What are the appropriate permitted building heights for various sites in and around the QTCZ;
- (c) The spatial extent of the MDRZ around Peregrine Place, Star Lane and Sunset Lane (Frankton Arm); and
- (d) The spatial extent of the HDRZ around Thompson Place and Lomond Crescent (Queenstown).

3.2 Following consideration of submitter evidence, and through expert witness conferencing with Ms Costello, I have updated my opinion in respect of:

- (a) The application of specified exclusions to recession plane standards within the LDSRZ and MDRZ on sloping sites;
- (b) A number of discreet increases or amendments to the calculation of permitted height limits for sites in the QTCZ including 10 Man Street, 11-19 Rees Street, 48-50 Beach Street and the Novotel Site on Earl Street;
- (c) An amendment to the matters of discretion (removal of matter (d)) related to standard 12.5.8 (building setback at upper floors);
- (d) A partial reduction in the spatial extent of MDRZ around Peregrine Place, Star Lane and Sunset Lane (Frankton Arm); and
- (e) An increase in the spatial extent of HDRZ around Thompson Place and Lomond Crescent (Queenstown).

3.3 In respect of submitter evidence that I do not agree with, the key outstanding matter relates to the overall extent of MDRZ around Peregrine Place, Star Lane and Sunset Lane. I still support retention of some of the MDRZ in this location in this area as it is relatively proximate to a wide number of amenities, including the Queenstown Town Centre.

SUBMISSIONS ON TEXT OR ISSUES

4. RECESSION PLANES ON SLOPING SITES WITHIN THE LDSRZ AND MDRZ

4.1 As set out in paragraph 2.3, I participated in urban design expert conferencing with Ms Costello which focussed on the application of recession planes for sloping sites under Standards 7.5.5 and 8.5.7.

4.2 With regard to Standard 7.5.5, the original intent of the change was driven by seeking alignment with the equivalent MDRZ standard 8.5.7. There was a minor increase in height enabled and some changes relating to subdivision within the LDSRZ but otherwise the LDSRZ provisions were largely unchanged as a result of the UIV. A key driver of both changes to the LDSRZ and MDRZ was that the recession plane exclusion for sloping sites was triggered when a site sloped greater than 6°. In my opinion, a site with a slope of 6° does not pose any obvious conflicts with the recession planes which applied under the PDP. However, I did note in Section 3.5 of my Urban Design Report accompanying the s32 analysis that there may be potential issue on south facing slopes at steeper gradients. The evidence of Ms Costello helped to elucidate that potential issue I had previously identified.

4.3 With regard to Standard 8.5.7, it was discussed that on steeper sloping, south facing sites that the additional development potential (in terms of gross floor area) and flexibility in how that is arranged across a site enabled by the combination of increased heights and generally more permissive recession planes would be difficult to realise. In addition, there are a number of existing MDRZ sites which feature a more restrictive 8m height limit with south facing slopes. In these instances (and where occurring on steeper sloping sites), there was the potential that the UIV may actually result in a decrease in development potential compared with what is currently enabled.¹ It was also discussed that one potential way to overcome this was to undertake more extensive excavation to enable more intensive building typologies to be accommodated within the recession planes. However, this has the potential to increase overall development cost and

1 As demonstrated in Annexure B of Ms Costello's evidence.

exacerbate other potential temporary effects (e.g. more prolonged noise during excavations, or increased HGV movements).

- 4.4** We also agreed that due to the overall increase in bulk enabled by the changes to the MDRZ provisions, that the retention of some recession planes on sloping sites was appropriate provided that these had a reasonable degree of flexibility.² The 4m + 60° standard was considered sufficient to support this regardless of whether it was located on a sloping or flat site.

5. HEIGHTS WITHIN THE HĀWEA LOCAL SHOPPING CENTRE ZONES

- 5.1** Mr Williams' planning evidence for Matt Laming (449) seeks an increase in the permitted building heights within the LSCZ in Hāwea from notified 10m to 14m.³ Mr Williams' evidence also includes a number of diagrams and high-level massing models setting out the rationale for his position.

- 5.2** Having reviewed Mr William's evidence, I am supportive of the proposed increase in height. In particular my reasons for this support are:

- (a) the Hāwea LSCZ is generally well separated from adjacent residential uses by 30m wide road corridors; and
- (b) building setbacks and recession planes continue to apply where it adjoins a residential zone to manage potential interface effects (noting that the Hāwea LSCZ has recently been redeveloped as a supermarket and further development over the life of the PDP would appear unlikely); and
- (c) an increase in height enables a greater level of development to be provided to help support an increased commercial offering for local residents – enhancing walkability and potentially reducing the need to travel to more distant commercial areas.

2 Paragraph 3.1.

3 Paragraph 11.

6. HEIGHTS WITHIN THE QUEENSTOWN TOWN CENTRE ZONE

48-50 Beach Street

- 6.1** Ms Costello’s evidence discusses the height of existing development at 48-50 Beach Street which had a bespoke height provision of 15m within the PDP.⁴
- 6.2** I generally concur with Ms Costello’s discussion at paragraph 89 although would note that a broader increase in height to this area such as that currently applies to 48-50 Beach Street could have wider amenity effects on the public realm in this location through an increase in extent and duration of shading during winter months (in the event that multiple sites are redeveloped to greater heights).
- 6.3** Noting that the existing building at 48-50 Beach is already approximately 12.5m and the PDP had a previous height limit of 15m I would consider it appropriate to maintain an exception for this site that is reflective of the existing situation. The original rationale for excluding this site was for an overall simplification of the standards which applied to the QTCZ and an assumption that it could rely on existing use rights for any infringement. However, I would now acknowledge based on more recent experience of projects in Auckland, that despite having existing use rights, the lower height limits proposed within the UIV could have an unintended impact on the “consentability” of any proposed redevelopment of the site.
- 6.4** For consistency with the balance of the QTCZ, I would consider the application of the upper floor setback as at Standard 12.5.8.2 currently proposed for height precincts 3 and 4 to be aligned with the general strategy for the town centre and the extent of existing development on the Site.

10 Man Street

- 6.5** Ms Costello’s evidence discusses the height provisions that relate to the site at 10 Man Street.⁵ The specific relief seeks to measure the permitted 20m height limit from a specific RL of 326.5 (in a similar manor to the neighbouring site at 12-26

4 Paragraph 85.

5 Paragraphs 103 – 110.

Man Street). The original submission point appears to have been missed during the preparation of evidence and the accompanying s42A report.

- 6.6** Having considered the evidence of Ms Costello, I have undertaken additional 3D modelling in line with Figure 4 of my EiC. An exert of this is shown in Figure 1 below with the additional bulk shown as a result of the requested relief shown in pink. In my opinion, any impact associated with this change is low-to-negligible in terms of potential urban design effects, noting that any future development would remain subject to a resource consent process. As such, I concur with Ms Costello and could support an amendment in line with her recommendations.

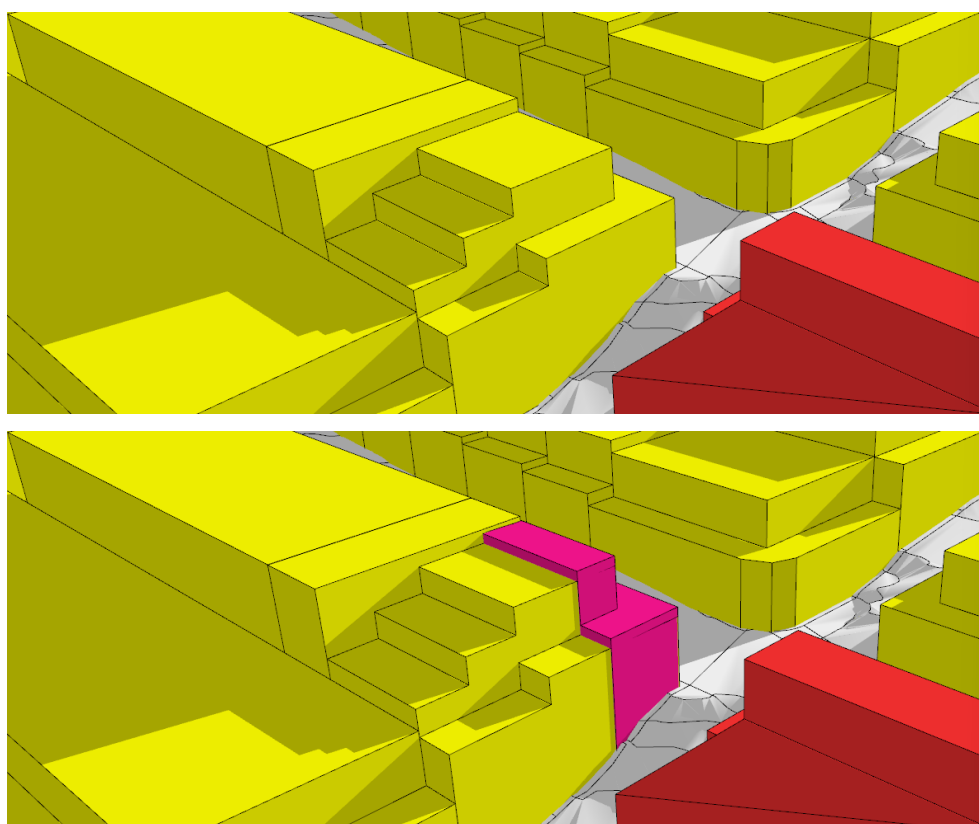


Figure 1 - Model Shot at 1.30pm on 21 July showing the notified theoretical bulk (top) against the recommended changes by the submitter for 10 Man Street (bottom in pink)

Novotel Site

- 6.7** Mr Compten-Moen's evidence for Coherent Hotel Ltd, Continuum Hotel Ltd and Queenstown Gold Ltd addresses proposed building heights⁶ across a number of sites in and around the QTCZ. I make no comment on the sites within the PC50 land

6 Paragraph 11.

that he identifies, that sit outside the QTCZ and I understand to be out of scope of the UIV.

- 6.8** With regard to Mr Compton-Moens support for a further 4m increased in the height standard for the Novotel site (increasing to 24m) I concur with Mr Compton-Moen's assessment. In particular, I concur that the location of the Novotel site in relation to the adjacent steeply sloping, wooded open space means it could more readily accommodate increased height with negligible urban design impacts.

11-19 Rees Street

- 6.9** Mr Compton-Moen's evidence for Reid Investments Ltd assesses potential effects of increasing permitted building heights⁷ at 11-19 Rees Street, within the QTCZ, from 12m to 20m. Mr Compton-Moen's evidence also usefully includes a number of high-level bulk and scale simulations and a shading analysis during both solstices and spring equinox. I do observe that these shading diagrams do not fully model the cumulative impacts from all sites and there appears to be an error where shading from development along Beach Street is identified as being related to additional shadow cast as per the Reid Investment Ltd's submission (i.e. is shown blue instead of orange). Nevertheless, I have been able to infer the approximate extent of shading generate from 11-19 Rees Street based on sunlight angles throughout the day.

- 6.10** Having reviewed this evidence (including supporting graphic analysis), I generally concur with the findings of Mr Compton-Moen and am supportive of the proposed increase in height at these sites at 11-19 Rees Street from 12m to 20m. I would observe that the potential additional shading (assuming redevelopment to the maximum permitted building envelope) on public street and public spaces appears negligible throughout the summer solstice. Some minor additional impacts can be seen on Rees Street for approximately 2-3 hours during the spring equinox which I consider to have a low effect overall. At the winter solstice, additional shading is cast towards the lake (although appears to fall primarily on the lake itself and unoccupied roof spaces) in the morning. Some additional shading may be

7 Paragraph 11.

generated in the vicinity of the Rees Street / Marine parade junction through the early afternoon. However, I have reviewed my own shading models created to inform the UIV and note that development up to 12m at the eastern end of Rees Street as proposed in the UIV would already cast shadows over this area. As such, I consider the overall increase in shading of the submitter's request to increase height to have a low effect.

7. PROVISIONS WITHIN THE QUEENSTOWN TOWN CENTRE ZONE

Building Setback at Upper Floors

- 7.1** Ms Costello's evidence discusses the matters of discretion relating to Standard 12.5.8 of the QTCZ, specifically supporting removal of matter (d) which refers to shading effects on adjoining properties.⁸
- 7.2** Ms Clouston's evidence (779) also supports amendments to Standard 12.5.8.1 so that building setback of upper floors apply to buildings that exceed a height of 8.5m rather than 8m, reflective of an existing exception relating to parapets. Ms Clouston considers that this effectively reflects a reduction in permitted height in the context of the NPS-UD.⁹
- 7.3** Turning first to Ms Costello's evidence, I generally agree with her on this matter and am of the opinion that it does not relate to the overriding purpose of the standard. I noted in Section 5.4.1 of my Urban Design Report which accompanied the Section 32 Report analysis that some additional sunlight opportunities onto neighbouring sites could be obtained through application of the standard. However, having read Ms Costello's evidence I am satisfied that the purpose of this rule and accompanying matters of discretion are better targeted towards effects on the streetscape / public open space rather than neighbouring sites. Further, retaining matter of discretion (d) has, upon reflection, the potential to give rise to an unnecessary consenting risk which could undermine design flexibility should there be valid design reasons and benefits to infringe Standard 12.5.8.

8 Paragraph 78.

9 Paragraph 19.

7.4 With regard to Ms Clouston’s evidence, I would observe that the parapet exception within the PDP relates to a decorative architectural feature designed to screen roof form and give the appearance of greater height. In this sense, it relates to purely aesthetic considerations and does not enable or support greater levels of development as appears to be suggested by Ms Clouston. Nevertheless, I do not consider that retention of the existing PDP exclusion relating to the provision of parapets up to 8.5m in height gives rise to any specific adverse urban design effects and may have some small upside in allowing for some increased flexibility during the design of any new building.

8. REZONING SUBMISSION, MDRZ TO LDSRZ IN QUEENSTOWN - ALISTAIR HEY, CARL SMILEY, BARBARA JARRY, AND DUNCAN AND TEIJA BOSCOE (281, 581, 651 AND 1386)

8.1 Mr Harland and Ms Jones have provided evidence for a number of submitters (281, 581, 651 and 1386) relating to reducing the notified extension of the MDRZ back to the current PDP LDSRZ for a number of properties around Peregrine Place, Star Lane and Panorama Terrace. I addressed these submissions points in a broad sense along with a number of other similar requests around Frankton Arm and Queenstown Hill in paragraphs 5.13 – 5.15 of my EiC.

8.2 Having read both Mr Harland’s and Ms Jones’ evidence on this matter, I would clarify that the accessibility and demand mapping and analysis that I undertook to inform the UIV was never intended to produce a clear “in” or “out” answer as to the spatial extent of zoning (and associated heights and densities) that would apply. Rather it was used to inform that assessment in line with other factors that need to be taken into account. Further the area in question, although performs relatively poorly when compared with areas immediately adjacent to centres / social infrastructure or along strategic transport corridors is still located centrally within an established urban environment. This is predominantly a result of a limitation of the methodology where two sites, one located at 5m outside of the chosen assessment catchment for a given destination with the other 800m outside are assigned the same “accessibility rating” for that particular destination.

- 8.3** Finally, I would also observe that Mr Harland has not provided an origin point for the calculation of the distances set out in Appendix 2 of his evidence while some destination points are not even aligned with what is being assessed. For example, the distance between the “subject land” and the edge of the QTCZ is approximately 1.4km. I note that the distance between the furthest extent of the subject land and the intersection of Ballarat St and Stanley Street (which is not the edge of the QTCZ) is approximately 2km consistent with the evidence of Mr Harland. I consider that presenting information as being representative of a larger piece of land when it appears based on the most extreme extents possible without appropriate caveats is not an approach that is typically undertaken within the industry. Rather a central point that is representative of a larger piece land or providing a range of distance is a more common approach. As such, the distances provided by Mr Harland have to be treated with caution – although usefully demonstrate that the entire “subject land” appears to be located within a 30-minute walk of almost every major destination that people generally require to go about their day-to-day lives.
- 8.4** As set out in paragraph 15.33 of my EiC, ultimately a line needs to be drawn somewhere and it would represent poor practice to “pepper pot” various zones / densities based purely on the outputs of the accessibility and demand mapping. To address this potential issue, my recommendations have adopted a more enabling approach to areas which either sit at the fringes of those locations identified as having greater accessibility and / or demand, are themselves sandwiched between such areas, or are still located near centres. This more enabling approach is, in my opinion, consistent with the entire policy thrust of the NPS-UD which at its heart seeks to better enable more development to occur within existing urban areas than has historically been the case.
- 8.5** Notwithstanding the above, I would observe that the area in question could potentially fall a number of ways when seeking to determine a rational zone boundary due to the topography, street boundaries and where these are located relative to those areas which performed better under the accessibility and demand analysis. Having considered these matters, I would support the alternative zone boundary as shown in Figure 5¹⁰ of Mr Harland’s evidence. In my opinion,

Mr Harland's preferred alternative of removing a more expansive area would not be well aligned to the analysis undertaken and overall intent of the UIV. Similarly, Mr Harland's alternative¹¹ bulk and location provisions seek to amend the entirety of the provisions relating to the MDRZ across the District and could significantly undermine the ability to deliver greater levels of intensification due to the comparatively restrictive approach to development that has been retained within the LDSRZ.

9. REZONING SUBMISSION, MDRZ TO HDRZ IN QUEENSTOWN - COHERENT HOTEL LIMITED, S HAINES AND M SPENCER, D AND M COLUMB, AND S AND R MILLAR (773, 1348, 1349 AND 1350)

9.1 Ms Clouston has provided evidence relating to rezoning of land around Thompson Street and Lamond Crescent from MDRZ to HDRZ on behalf of a number of submitters. This was not addressed during the preparation of the S42A report and appears to have been an oversight.

9.2 The boundary between the HDRZ and MDRZ was first established through the PDP process. The area itself was identified as having low to moderate levels of accessibility relative to other areas but was identified performing well in terms of relative demand when compared with other areas. In terms of its accessibility, I would observe that I would expect this area's performance to improve over time as and when build-out of the PC50 area commences / advances (which at its closest lies approximately 250m east of the existing MDRZ). Based on the scale of development enabled by PC50, it likely to offer greater employment opportunities and amenities such as cafes / restaurants which can be support more intensive forms of housing.

11 Paragraphs 53 and 54.

- 9.3** Based on the above, and considering the overall intent of the UIV, I consider that rezoning the MDRZ around Thompson Street and Lomond Crescent would be appropriate in urban design terms.

A handwritten signature in black ink, appearing to read 'C. Wallace', with a large, sweeping initial 'C' and a horizontal line extending from the end of the signature.

Cameron Wallace

24 July 2025