

Corinne Frischknecht for QLDC – Summary Statement for Medium and High Density Residential Zones and Lake Hāwea Residential Zones

1. My residential evidence addresses planning matters associated with the following chapters to the Proposed District Plan (**PDP**):
 - (a) Chapter 8 – Medium Density Residential Zone (**MDRZ**);
 - (b) Chapter 9 - High Density Residential Zone (**HDRZ**); and
 - (c) For Lake Hāwea only - Chapter 7 Lower Density Suburban Residential Zone (**LDSRZ**) and Chapter 8 (MDRZ).
2. Intensification in the MDRZ and HDRZ, including greater building heights and density standards, assists with implementing Policy 5 of the NPS-UD, which seeks to enable greater housing supply and more intensive development in areas with high accessibility and/or high relative demand.
3. The notified provisions, alongside recommendations through my 42A report and rebuttal evidence, also aligns with the outcome and directive in Objective 1 and Policy 1 of the NPS-UD by enabling a range of housing typologies to ensure the zones contribute to achieving a well-functioning urban environment. Ms Bowbyes' evidence has discussed these provisions outcomes sought by the NPS-UD in detail in her s42A on Strategic Evidence.
4. Submissions received provide a mix of support and opposition to the notified LDSRZ (in Hawea), MDRZ, and HDRZ standards that were varied by the UIV. The main issues raised by submitters are:
 - (a) The appropriateness of the objective, policy and rule frameworks for both the MDRZ and HDRZ, particularly in relation to character and amenity of existing residential areas; and
 - (b) Bulk and Location standards.

Chapter 8 – Medium Density Residential Zone

5. The purpose of the MDRZ is to provide for residential development at greater density than the Lower Density Suburban Residential Zone (**LDSRZ**). Along with the LDSRZ and HDRZ, the MDRZ plays a key role in minimising urban sprawl, increasing housing supply and diversity

through provision for attached housing. In many locations, the MDRZ provides a transition between LDSRZ and higher intensity zones, such as the HDRZ and business zones.

6. It is acknowledged in the Urban Design Report (appended to the s32 Report) that the objectives, policies and standards of the current PDP MDRZ are generally not well aligned with enabling typical medium density style development or development that meets the definition of a MDRZ under the National Planning Standards.
7. The key changes proposed by the notified UIV for the MDRZ include amendments to enable intensification, in response to Policy 5 of the NPS-UD, particularly through increased heights and densities, and enable a range of housing typologies (including low-rise apartments) to ensure the MDRZ contributes to achieving a well-functioning urban environment (Policy 1, NPS-UD).
8. In response to submissions and further submissions received on the notified MDRZ provisions, I recommended the following amendments in my S42A report:
 - (a) Amendments recommended to the Notified Zone Purpose to recognise building heights will be *up to* three storeys, rather than stating buildings *will* be three storeys.
 - (b) Amendments to Notified Rule 8.5.6 Outlook Space (per unit) to refer to 'main' rather than 'principal' when referring to living room/space. Also to make it clear that if there is more than one window or glass door in a room, then it is measured from the largest one. I note that this recommended amendment aligns with the amendment to the notified definition of *outlook space*, as recommended in Ms Bowbyes' s42A report on Chapter 2; and
 - (c) Amendments to PDP Rule 8.5.9 Minimum Boundary Setback, to provide additional flexibility for sites that adjoin two road frontages (excluding Arterial or Collector Roads).
9. I have considered the evidence filed by submitters on Chapter 8, I do not recommend any further amendments.
10. The key outstanding matters of disagreement of particular interest to submitters are the following:

- (a) Amendments sought by Arthurs Point Trustee Limited (1260) to Notified Rule 8.5.5.1(a) to increase height limits from 8m to 11m on the Mid Terrace of 182D Arthurs Point Road. I am not convinced that the increased height sought and associated potential effects upon the surrounding ONL/Fs aligns with section 6(b) of the RMA. This is supported by a review of landscape evidence of Mr Milne (on behalf of the submitter) by Ms Mellsop. A copy of the memo is attached to my rebuttal evidence.
- (b) Amendments sought by submitters to increase heights and densities within the MDRZ. In my opinion, the MDRZ height and density provisions as notified will better facilitate the delivery of housing intensification (in accordance with Policy 5 of the NPS-UD) whilst balanced with Policy 1 by ensuring that the intensification contributes to a well-functioning environment.
- (c) Amendments sought by submitters to apply a 4m/60 degree recession plane for all boundaries including the southern boundary for MDRZ. This was also agreed by Ms Costello and Mr Wallace as part of Joint Witness Conferencing. However, I am not convinced that the one example provided by Ms Costello for is a true reflection of all sloping sites in Queenstown nor does it provide sufficient reasoning to persuade me to recommend amending the notified recession planes for sloping sites in the MDRZ.

Chapter 9 – High Density Residential Zone

- 11. The purpose of the HDRZ as outlined in the PDP is for the efficient use of land located within close proximity to Queenstown and Wānaka town centres, Three Parks and Arthurs Point that is easily accessible by either public transport, cycle and walkways. The HDRZ has a higher level of accessibility and relative demand than the MDRZ and therefore the notified UIV proposes greater building heights and densities to assist with giving effect to Policy 5 of the NPS-UD. The notified provisions, alongside recommendations through my 42A report and rebuttal evidence, also aligns with the outcome and directive in Objective 1 and Policy 1 of the NPS-UD in providing a greater diversity of housing supply and contributing to well-functioning urban environments.
- 12. Queenstown was identified as having the highest level of accessibility and relative demand in the urban environment in the Accessibility & Demand Analysis. Wānaka was also identified as an area of high accessibility albeit slightly lower than Queenstown, and this is reflected in

the slightly lower building heights recommended in the Wānaka HDRZ. This is also supported by the Economic Assessment which indicates that the Wānaka / Hāwea catchment is projected to gradually shift toward a greater share of attached dwellings, but at a slightly slower rate than the district overall.

- 13.** The Urban Design report acknowledges that the PDP objectives and policies for the HDRZ are generally well aligned with enabling denser types of development. However, some amendments were considered appropriate to be more enabling of the higher densities envisioned by the zone framework and national policy direction.
- 14.** In response to submissions and further submissions received on the HDRZ I recommended the following amendments to the notified version in my S42A Report:
- (a) Amendments to PDP Objective 9.2.1 to remove the word ‘housing’ so it refers to all high density development.
 - (b) Amendments to PDP Objective 9.2.2 to remove the term ‘high density residential’ so it refers to all development.
 - (c) Amendments to PDP Objective 9.2.3 to remove the term ‘high density residential’ so it refers to all development and replace the word ‘minimum’ with ‘appropriate’ when referring to level of existing amenity values for neighbouring sites. This is also reflected in amendments to Notified Policy 9.2.3.1.
 - (d) Amendments to Notified Policy 9.2.6.5 to acknowledge that a reduction in parking provision is encouraged to help facilitate modal shift.
 - (e) A new rule and policy are recommended to enable buildings up to 20m in the HDRZ at Three Parks Wānaka, where the outcome is of high-quality design; and the additional height would not result in shading that would adversely impact on adjoining Residential zone and/or public space or does not dominate the streetscape.
 - (f) Amendments to Notified Rule 9.5.7 Building height setback at upper floors to provide for exemption along State Highway Road boundaries, when the 4.5m setback in Rule 9.5.6.1 is complied with.
 - (g) Minor amendments to Notified Rule 9.5.8 Outlook Space (per unit) to refer to ‘main’ rather than ‘principal’ when referring to living room/space. Also to make it clear that if there is more than one window or glass door in a room, then it is measured from the largest one.

In my rebuttal evidence, I acknowledge that in paragraph 5.53 of my S42A Report I make the recommendation, amongst other changes, to remove the word 'existing' from Objective 9.2.3. However, due to an administrative error this recommendation was not marked up on the S42A Recommended Provisions. I stand by my assessment in paragraphs 5.44 - 5.52 of my S42A Report (which includes a s32AA assessment) and consider that removing the word existing is more appropriate in achieving the objectives of the PDP than the notified version. This has been corrected in the Rebuttal Version of the Recommended Provisions.

15. I also wanted to add, that in paragraph 7.31 of my rebuttal evidence I acknowledge and agree with Mr Willams on behalf of Willowridge Development, Orchard Road Holdings Limited and Three Parks Properties Limited (948) that the additional policy recommended in my S42A Report is not necessary (s42A Policy 9.2.10.2) given that I have recommended that 16.5m is the most appropriate height for this zone
16. The key outstanding matters of disagreement that were of particular interest to submitters are:
 - (a) Amendments to matters of discretion, activity status and notification for breaches to Rule 9.5.1 Maximum Building Heights - Given that there is no maximum building height via tiered approach in the HDRZ, in my opinion, the matters of discretion and restricted discretionary activity status provide an appropriate consenting pathway for any buildings exceeding 16.5m in height. I also consider it appropriate to enable a high-density development to be subject to notification tests where it infringes the built form permitted activity standards.
 - (b) Visitor Accommodation – I do not agree that a more restrictive recession plane or building height should be applied for non-residential buildings. I note that both residential activities and visitor accommodation is anticipated in the HDRZ and that the rule framework for buildings does not distinguish between different uses of buildings, which can change over time.

Lake Hāwea - Chapter 7 (LDSRZ) and Chapter 8 (MDRZ)

17. While no changes were proposed to the location or extent of the LDSRZ and MDRZ at Lake Hāwea through the notification of the Variation, the notified built form changes to the LDSR and MDR zones apply to both Lake Hāwea and Lake Hāwea South. A number of submissions were received in opposition to the notified changes to the LDSRZ and MDRZ provisions, and

submitters raised concern with infrastructure constraints. The approach to intensification in Lake Hāwea in regard to three waters is addressed in Section 5 of Mr Powell's evidence on infrastructure. As for the submissions seeking reductions in permitted building heights, density controls and /or maintaining the status quo, I am not persuaded that retaining existing PDP height limits would still give effect to the NPS-UD, particularly Policies 1 and 5 in contributing to well functioning environments and enabling heights and density of urban form commensurate with the greater of the level of accessibility or relative demand.

- 18.** No planning evidence was received from submitters specific to Hāwea, therefore, I maintain the position expressed at Section 6 of my s42A Report.

Summary

- 19.** Overall, I consider that the changes proposed to the MDRZ and HDRZ, including my recommended amendments through my S42A and rebuttal evidence, are the most appropriate to give effect to:

- (a) Policy 5 of the NPS-UD, including greater heights and density standards in areas with high accessibility and demand;
- (b) Objective 1 and Policy 1 of the NPS-UD in providing for well-functioning urban environments and enabling people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- (c) Contribute to achieving an acceptable level of amenity and character of the existing MDRZ and HDRZ whilst also acknowledging that the NPS-UD anticipates that urban environments/character will change.
- (d) Achieve the Strategic Directions of the PDP and give effect to PDP Strategic Objective 3.2.2 in that urban growth is managed in a strategic and integrated manner and particularly PDP Policy 3.2.2.1 which seeks that urban development occurs in a logical manner so as to promote a compact, well design and integrated urban form and ensures a mix of housing opportunities.

Corinne Frischknecht

28 July 2025