

**Before the Hearing Commissioners
at Queenstown**

In the Matter of

the Resource Management Act
1991

And

In the Matter of

a proposed variation to the
Queenstown Lakes Proposed
District Plan – Te Pūtahu Ladies
Mile Variation

**Summary Statement of
Alex John Dunn
for Doolytle & Son Limited**

Dated: 6 December 2023

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INTRODUCTION

Qualifications and Experience

1. My name is Alex John Dunn. I am a Planner at Southern Planning Group Limited. I have prepared a statement of evidence on behalf of Doolytle & Son Limited (**Doolytle**) dated 20 October 2023 in relation to its submission on the Te Pūtahi Ladies Mile (**TPLM**) variation (**Variation**). I have the qualifications and experience set out at paragraphs [1] - [6] of my evidence. I reconfirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023.

Relief Sought

2. I confirm that Doolytle seeks the following relief:
 - (a) that its land at 466 Frankton – Ladies Mile Highway be rezoned TPLM – Commercial Precinct with a site-specific 12m height limit; or
 - (b) that is land at 466 Frankton – Ladies Mile Highway be rezoned PDP High Density Residential Zone.
3. No other relief is being pursued.

Appropriateness of Relief

4. The overarching purpose of the zone is to ensure a self-sustaining community that integrates with nearby zones and that is also inclusive of communities in nearby zones. Objective 49.2.1 requires that development complements and integrates with adjoining urban development at TPLM and development south of State Highway 6.
5. From an integration point of view, restricting commercial activities to be on the northern side only will result in future commercial activities being centralised for the new northern community. This conflicts with Objective 49.2.1.
6. It is commonly accepted that the existing Shotover Country and Lake Hayes Estate communities do not have sufficient commercial zoned land.
7. TPLM – Commercial Precinct zoning on the Site would result in the creation of a commercial corridor extending from the notified Commercial Precinct in the north to Kawarau Park in the south. While this corridor would be bisected by the highway and the Open Space Precinct, the area will clearly read as non-residential in nature.
8. Council's economic evidence primarily seems concerned that having commercial precinct zoning on the submitter's land will compromise and compete with the vitality

and general operation of the notified commercial precinct area. No large format retail is proposed for the Site. This alleviates concerns of excessive LFR floor space.

9. An additional commercial area (neighbourhood centre) within the Eastern Access Corridor area has been supported by Ms Hampson.¹ Ms Hampson states that should the Anna Hutchinson Family Trust submission be accepted; it will provide for additional convenience retail and commercial floorspace for the future population to the west of the TPLM Zone.
10. I consider that extensive consideration appears to be given to new residents of the Zone. On the other hand, there appears to be little no consideration for existing residents and their current needs.
11. Rezoning of the Site to TPLM – Commercial Precinct will allow existing residents to walk/cycle to access commercial services. This in turn will reduce vehicle trips and provide a more active travel friendly neighbourhood for existing communities and Shotover Country will assist with reducing carbon emissions.
12. A conservative estimate of the additional TPLM – Commercial Precinct zoning on the southern portion of Ladies Mile would result in 50 less passenger trips out of Lake Hayes Estate and Shotover Country per day.
13. Ms Hampson supports “live/work” developments on the Site, provided they exclude retail activities. While this would allow some commercial development of the Site, it would not provide for the day-to-day needs of residents located within the southern portion of the Eastern Access Corridor.
14. With regard to the wider Queenstown urban area and existing primary commercial centres of the Queenstown CBD and Frankton, the proposed TPLM – Commercial Precinct zoning on the Site will not compete or undermine these areas. The TPLM – Commercial Precinct zoning on the Site will provide day-to-day commercial services for Eastern Access Corridor residents, including existing residents.
15. Overall, I consider a rezoning of the Doolittle site to TPLM – Commercial Precinct would better achieve the objectives of the Variation compared to the notified Low Density Residential Zoning.
16. If a rezoning to TPLM – Commercial Precinct is not granted, Doolittle supports a rezoning of the site to High Density Residential as considered appropriate in the rebuttal evidence of Jeffrey Brown dated 10 November 2023.²

¹ Rebuttal Statement of Natalie Hampson dated 10 November 2023 at [20].

² At para [109].



Alex John Dunn

6 December 2023

