

Before an Independent Hearings Panel
Appointed by Queenstown Lakes District Council

under: the Resource Management Act 1991

in the matter of: Submissions and further submissions on Queenstown
Lakes Proposed District Plan 2023

and: Urban Intensification Variation

and: **Coherent Hotel Limited (Coherent)**
(Submitter 773 and Further Submitter 1351)

and: **Continuum Hotel Limited (Continuum)**
(Submitter 771)

and: **Queenstown Gold Limited (QGL)**
(Submitter 765)

Statement of evidence of David Compton-Moen

Dated: 4 July 2025

STATEMENT OF EVIDENCE OF DAVE COMPTON-MOEN

INTRODUCTION

- 1 My name is David John Compton-Moen.
- 2 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University. I have been a Registered Landscape Architect of the New Zealand Institute of Landscape Architects ('NZILA') since 2001, a full member of the New Zealand Planning Institute, since 2007, and a member of the Urban Design Forum since 2012.
- 3 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 4 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong. During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
 - 4.1 2024 – Queenstown Hotel Fast Track Application. I was involved in expert conferencing on behalf of an affected party assessing the urban design effects of a proposed hotel on Man St above the existing Man St Carpark. The building sought relief for setbacks, building height and the location of View shaft.
 - 4.2 2019-2021 - Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones. Working with QLDC staff and Vivian Espie, I was tasked with preparing Design Guides for Residential and Business Mixed Use Zones.
 - 4.3 2022- current – Te Pa Tahuna Super Lot 01. I have been working with Mike Greer Commercial and Ngai Tahu on the development of 3 apartment buildings on the old school site.
 - 4.4 2015-2020 Future Plan – Intensification of Residential Areas, Medium Density Design Guide and Plan Change 43, Hutt City Council. I worked with Council staff to develop provisions and design guides for intensification of Residential and Suburban Commercial centres in Hutt City.
 - 4.5 2020 – Working with Hastings District Council and Stantec, a design guide was prepared for Intensification of Residential Areas within Hastings District.
 - 4.6 2024 – Working for Carter Group to provide Urban Design and Landscape advice for Environment Court mediation for West Rolleston (previously PC73, 81 and 82) which includes provision for approximately 3,500 new dwellings and 4 commercial centres of varying sizes. Each centre was modelled to test how each one could be developed to provide for future residents' day-to-day needs.

- 4.7 2020- current – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for several Medium Density Residential and Mixed-Use Developments: Madras Square (+90 homes); 476 Madras Street (98 homes); 258 Armagh Street (33 homes); and 33 Harewood Road (31-homes).
- 4.8 2017-current - Acland Park, Rolleston – master planning and landscape design for a 1,000-lot development in Rolleston. This development is almost completely built out with only the small commercial centre to be built.
- 4.9 2022- current - Harrow Green, Rolleston – provision of urban design advice for a residential development for 266 dwellings against the proposed MDRS rules. Our office is currently working on the landscape design of this subdivision.

- 5 I am familiar with Coherent, Continuum and Queenstown Gold Limited’s submission on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and their respective interests in land.

CODE OF CONDUCT

- 6 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

- 7 The purpose of my evidence is to set out my involvement in the preparing of evidence to support requests for rezoning and reclassification of height. My evidence should be read in conjunction with the Graphic Attachment appended.
- 8 My evidence will deal with the following:
- 8.1 Methodology for Modelling and Proposed Submission Heights;
 - 8.2 Anticipated, including Consented, Receiving Environment;
 - 8.3 Building Setback for Upper Floors and Shading Issues;
 - 8.4 Building Dominance from Increasing the Height of the Continuum Land and QGL Land; and
 - 8.5 Extension of the High Density Residential Zone to include western Thompson Street.
- 9 In preparing my evidence, I have reviewed:
- 9.1 The UIV Section 42A (Town Centres and Business Zones) report prepared by Corinne Frischknecht, 6 June 2025;

9.2 UIV Statement of Evidence (Urban Design) by Cam Wallace, 6 June 2025; and

9.3 Strategic Evidence Appendix 2 – Summary of submissions and decisions.

METHODOLOGY FOR MODELLING

- 10 To assist with determining and testing effects of the proposed submissions, our office has imported LIDAR information, including current buildings and vegetation in Sketchup. We have then overlaid the proposed 'Bulk Forms' proposed under the UIV, including the increased height at 12-26 Man St over the carpark, to gain a better understanding of the spatial implications of the proposed increases.
- 11 We have also modelled several Submission proposals which seek greater Intensification and Consented developments including the following (refer to Figures 1 and 3 in the Graphic Attachment):
- 11.1 Crowne Plaza seeking 24m from the current ODP limit of 7m;
 - 11.2 Centuria Site seeking 24m from a currently consented 18m;
 - 11.3 Novotel Hotel seeking 24m from the proposed UIA limit of 20m;
 - 11.4 30 Man St seeking 24m from the current ODP limit of 12+2m;
 - 11.5 34 Brecon Street is consented to be 23m;
 - 11.6 12-26 Man St is consented to be 23.78m above the carpark (refer to Figure 2 in the Graphic Attachment);
- 12 A series of images have been prepared from an elevated location above the lake and then from water level. The intention of this is to highlight the 'amphitheatre' nature of the town centre and how buildings typically step-up the slopes around the Lakefront (refer to Figures 5-12 in the Graphic Attachment) .
- 13 A photo-illustration has been created for the proposed view looking back at the site from Lake Esplanade.

ANTICIPATED, INCLUDING CONSENTED, RECEIVING ENVIRONMENT

- 14 From looking at a combination of the UIV provisions and the consented receiving environment there is significant development occurring on the uphill side of Man Street and along Brecon Street where the current height limits are breached. This includes the following consented developments (refer to figure 1 of the Graphic Attachment):
- 14.1 Lakeview with buildings up to 42m;
 - 14.2 34 Brecon Street at 23m;
 - 14.3 Centuria Hotel (17-19 Man St) at 18m; and
 - 14.4 21-23 Man St at 15.5m.

- 15 When combined with the UIV heights, the PC50 land that is not yet incorporated in the PDP is noticeable for the lack of potential built form. From a built form perspective bringing these sites up to 24m in height, with an Upper Floor setback, would allow for greater Intensification without creating adverse effects on adjoining properties. It would also recognise the consented developments which already exceed the current height standards.
- 16 In relation to the Coherent Land on Thompson Street, the adjoining HDR zoned land would be brought up to a permitted height limit of 16.5m. The MDR zoned land is proposed for increase to 11m in the Variation.

BUILDING SETBACKS AT UPPER FLOORS AND SHADING ISSUES

- 17 The proposed upper floor building setbacks of 3m for buildings between 12m and 16m and 6m setback above 16m on road frontages is considered a positive design aspect as it will assist with bringing sunlight into public spaces and streets. The setback ensures that steep vertical walls do not occur immediately on the street edge which would potentially sunlight and visual dominance issues.
- 18 The implementation of this setback on the Continuum and QGL Land and surrounding area would ensure that any potential shading issues on adjoining properties would be mitigated.

BUILDING DOMINANCE FROM INCREASING THE HEIGHT OF THE CONTINUUM LAND AND SURROUNDING AREA

- 19 The proposed UIV height limit for the Novotel site is 20m.
- 20 The proposed Submission height of 24m would allow for an additional storey to be achieved across the site without adversely affecting any other properties due to the site's surrounding topography, and existing vegetation, where the slope behind the site rises up to 328masl (Park Street). The increase in height would be consistent with other blocks in the Town Centre which circle the town centre, and with the implementation of the Upper Floor setback concerns over building dominance and shading mitigated.
- 21 Increasing the block's potential height will also be consistent with the increased height that has been given to other blocks in the Town Centre.

BUILDING DOMINANCE FROM INCREASING THE HEIGHT OF THE QGL LAND AND SURROUNDING AREA

- 22 The proposed UIV height limit for the upper section of Brecon Street, being 27 Brecon Street and the QTCZ land bounded by Isle Street and Brecon Street, is 16.5m.
- 23 The proposed Submission height of 24m would bring this area up to be being consistent with other blocks surrounding the edge of the Town Centre without causing adverse effects on nearby properties. The High density residential area immediate to the north of the area, currently occupied by Queenstown Primary School sits at a slightly lower elevation than the buildings along Brecon Street
- 24 No adverse effects in terms of Building Dominance.

REZONING OF MDR TO HDR IN PROXIMITY TO THE TOWN CENTRE - COHERENT LAND

- 25 As shown in Figure 3 of the Graphic Attachment, 94 Thompson Street and MDR zoned land in western end of Thompson Street and Lomond Crescent is a pocket of medium density development in close proximity to the town centre and immediately adjoins High density residential. From the corner of Lomond Cres and Thompson Street it is approximately 800m to the Crowne Plaza site, or a 10-minute walk. I consider the MDR zoning in this location to be an anomaly as the area is highly accessible and in close proximity to amenities.
- 26 I am not aware of any constraints that would require retention of MDR zoning in this area. Upzoning this pocket to HDR would allow greater intensification without creating adverse urban design effects.

CONCLUSIONS

- 27 In reviewing the proposed UIV provisions and modelling of the Town Centre, I am of the opinion that:
- 27.1 Increasing the height limit on the edges of the town centre will provide additional capacity for intensification without creating adverse Building Dominance or shading issues. This includes the relief sought by both Continuum and QGL.
- 27.2 Rezoning of the MDR land in western Thompson Street and Lomond Crescent will promote increased opportunity for positive urban design outcomes close to the town centre.

Dated: 4 July 2025

Dave Compton-Moen