

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER OF: The Resource Management Act 1991

AND: The Queenstown Lakes District proposed District Plan - Hearing
Stream 13 – Queenstown Mapping Annotations and Rezoning
Requests

STATEMENT OF REBUTTAL EVIDENCE OF ANDREA FARMINER ON BEHALF OF

DJ and EJ Cassells and Ors (#503)

Friends of the Wakatipu Gardens and Reserves (#506)

Dated: 7th July 2017

Statement of Rebuttal Evidence of Dr Andrea Farminer for Cassells, Ors and Friends of the Wakatipu Gardens and Reserves

1. My full name is Dr Andrea Susan Farminer.
2. I have the qualifications and experience set out at paragraph 1 of my statement of evidence in chief, dated 9th June 2017 ('EIC').
3. I confirm that I am authorised to give this evidence on behalf of DJ and EJ Cassells, Ors and Friends of the Wakatipu Gardens and Reserves.
4. In this statement of rebuttal evidence, I am responding to the evidence of:
 - 4.1.1 Amanda Leith on behalf of Neville Mahon (Submitter #628) dated 9th June 2017.

EXECUTIVE SUMMARY

5. The evidence presented by Amanda Leith on behalf of Neville Mahon recommends that an area located at the northern end of Park Street (2-26 Park Street and 1, 9, 13A and 13B Brisbane Street), adjacent to the Queenstown Gardens, is re-zoned in the Proposed District Plan ('PDP') as High Density Residential ('HDR') as opposed to its current PDP recommendation as Medium Density Residential ('MDR'). This recommendation is based primarily on the area's proximity to the Queenstown Centre zone ('QTC').
6. The counter evidence presented in this rebuttal statement points to the fact that any such re-zoning will have a significant potential of being highly detrimental to the existing, special residential character of the Park Street - Brisbane Street area, and to the significant streetscape, aesthetic and amenity relationships that exist between the area and the Queenstown Gardens. I propose that the Park Street - Brisbane Street area is recognised as of special streetscape character and value to the Queenstown Centre area within the PDP and consider that up-zoning to High Density Residential zoning within this area would be inappropriate.

EVIDENCE

7. Paragraph 13 of Ms Leith's evidence discusses the s42A report prepared by Ms Rosalind Devlin and acknowledges that Ms Devlin rejected the HDR re-zoning request for the Park Street area on the basis that the '*subject sites [would be] overlooking the Queenstown Gardens and Outstanding Natural Landscape (ONL). Given the potential 12m building height and the sites adjoining established residential housing and some protected heritage features Ms Devlin also considers that there is the potential for HDR development to be out of character in this location.*'
8. I am in agreement with Ms Devlin's recommendation that increased building heights and building density along Park Street will impact on the highly significant and valuable townscape and natural qualities of the Queenstown Gardens. In particular, it has the potential to negatively impact on the integral relationship it holds with the distinctive, mixed residential character of the adjacent Park and Brisbane Streets, through significantly altering that relationship in favour of a strongly urban and incongruous one. Park Street contributes an important interface and transition zone from the Gardens to the increasingly built-up and larger scale development that lies eastwards. This relationship was described in paragraph 6 of my EIC and Appendix 1: Section 4.3.

9. Paragraphs 24 - 28 of Ms Leith's evidence discusses the proximity of the Park Street area to the QTC, concluding that it is a suitable area for HDR due to its proximity to the QTC and would be *'the most efficient use of the land'*, and notes that the blocks between Hobart and Suburban Streets have been recommended for HDR in the PDP. Ms Leith suggests that leaving the subject area as MDR in the PDP *'creates a two block area of MDR close to the QTC which people would have to travel through HDR areas to get to.'* This implies that: i) zoning the subject area as MDR is an inefficient use of the land, and ii) this proposed HDR zone east of the Park Street-Brisbane Street blocks would somehow impose an impediment of access to the Park Street area beyond whatever access is currently existing.
10. In response to i) above and as discussed in paragraphs 7 and 10 of my EIC, the lower density and evolving residential nature of the Park Street-Brisbane Street area that developed from the 1870s onwards, is one of the unique character and amenity values that the area contributes to the QTC through providing a counterpoise to the intensely urban, concentrated and built streetscape character of the nearby QTC. As such it provides, along with the larger area of the Queenstown Gardens, a vital and important *'breathing space'* amidst the intensity of the wider town. Increasing the density of the subject area through HDR re-zoning will adversely impact on this unique character value by increasing the densification of the area with a consequent reduction in its amenity and streetscape character and value to Queenstown.
11. In response to ii) above and as illustrated on Figure 3 of Ms Leith's evidence, an increase in density in the blocks east of Hobart Street is very unlikely to alter the existing street layout and therefore equally unlikely to alter the current level of access to the Park Street area via the street plan for pedestrians and vehicle users alike. The existing thoroughfares from the QTC to the Park Street area, Lake and further eastwards (and in reverse), whether via the Queenstown Trail or Coronation Drive/Frankton Road, will be retained whether the Hobart Street blocks are increased to HDR or maintain their current densities. Increasing housing density in the Hobart Street area will not affect direct access to the existing or proposed MDR Park Street area. As noted in paragraph 8 above, the Park Street-Brisbane Street area contributes an important interface and transition zone for pedestrians, vehicular users and residents from the QTC (and Gardens for pedestrians) to the increasingly built-up and larger scale development that lies to the east. This important transition zone provides amenity value for travellers and residents both in and out of the QTC via Coronation Drive through providing an approachable and human-scale environment and experience.
12. Paragraph 31 of Ms Leith's evidence discusses the height issues of the proposed HDR re-zoning in the subject area, noting that taller buildings will overlook the Gardens, but does not consider this to have negative effects. In line with paragraph 4 of my EIC, I strongly disagree with this assessment, in tandem with Ms Devlin's comment re: dominance effects, on the basis that the effects of overlooking the gardens from Park Street are far less relevant in terms of the impacts of new building heights, and that the most significant effects will be from the increased massing, height and overshadowing of the highly important access and green perimeter to the Gardens. Currently, the Gardens is part of the natural pedestrian *'flow'* from the QTC and Marine Parade to the Frankton Arm, and the smaller massing, one or two storey heights and setback nature of the Park Street frontage to the Gardens contributes to this sense of *'flow'* and inviting streetscape. A substantial increase in storey heights and massing along Park Street has the potential to create a *'hard'* barrier to the eastern end of the Gardens for users, along with the potential to negatively compromise the highly valued, aesthetic and greening qualities the Park Street-Gardens confluence provides.
13. Paragraph 32 of Ms Leith's evidence states that *'Activity and views within the Gardens are not generally orientated out toward Park Street'*. To some degree this is an accurate view as the

Gardens have been designed to draw pedestrians into their landscape and features. However, with the main entrances and visitor car parking areas extending along Park Street, there are significant aesthetic and amenity views exchanged between the different areas, particularly either side the Park Street corridor towards the lake (refer to Figure 1). These views outwards from the Gardens towards Park Street are considered to be an essential part of the Gardens experience in themselves, and provide significant streetscape and setting value contributions to the Gardens and area as a whole.



Figure 1: Left – view along Park Street towards the Gardens (in centre of image); right – the view from the Gardens entrance across Park Street and towards the lake.

14. Paragraphs 33 of Ms Leith's evidence states that *'the interface between the subject sites and the Gardens and Park Street could be managed effectively through mandating good urban design rather than through a reduction in the density and height.'* I disagree with this statement on the basis outlined in paragraph 12 above. Furthermore, relying only on a 'good urban design' argument may not adequately protect the unique and highly valuable character values of the Park Street area which are particularly vulnerable to poor urban design decisions resulting from height and mass increases.
15. Paragraph 35 of Ms Leith's evidence also places reliance on future 'High Density Residential Design Guidelines'. In my opinion, and as past experience elsewhere has demonstrated, such guidelines tend to be somewhat generic and limited in their scope and application, and do not always provide for special character areas, as they are applied zone-wide rather than addressing individual character areas within them. Again, this would potentially allow the special character values of the Park Street-Brisbane Street area to be overlooked in such guidelines, with the potential for loss of its unique residential character.
16. Paragraph 40 of Ms Leith's evidence states that *'I do not consider there to be a visible or obvious unifying character either in built form style, pattern of development or other notable characteristic. The housing stock is of varied ages, styles and standards.'* As discussed in Appendix 1 of my EIC and the EIC as a whole, it is this very amalgamation and mixture of building fabrics that contribute significantly to area's distinguishing residential character; these combine historic stone, timber and corrugated iron juxtaposed with more modern timber, brick and rendered block. In combination with low storey heights, smaller masses and naturally offset footprints and boundaries, the built character of the Park and Brisbane Street area reflects a cultural heritage of extended development that has almost vanished from the remainder of Queenstown. Recognition of the importance of this small area of surviving, mixed era, historic and more recent residential development has been frequently overlooked in my opinion, along with its significant contribution to the sense of place, amenity and broader cultural and social values of the QTC and its surrounding settlement.

17. Paragraph 41 of Ms Leith's evidence discusses the protection proposed for heritage features in Chapter 26 of the PDP, concluding that *'If any of the sites which are included within the re-zoning request are within the 'setting' of a heritage feature then consent may be required under this PDP rule which will therefore allow assessment of the potential effects on the heritage values of the feature and its setting.'* Whilst this is technically correct in its assertions, in my experience of heritage protection with regard to heritage 'setting' and its outcomes, this is actually more of an assumption of heritage protection rather than an absolute. An assessment of the potential effects on the setting of a heritage place will not necessarily prevent inappropriate development from taking place nearby and certainly will not prevent inappropriate development from affecting the character of a wider area containing heritage sites, such as in the case of Park Street and Brisbane Street.
18. I have argued in the Special Character Appraisal report contained in Appendix 1 of my EIC, that the Park Street-Brisbane Street character area is more than the sum of its parts. It is the unique combination of streetscape and place elements already outlined, some of which include recognised heritage buildings that requires consideration and protection to some degree rather than isolating its 'historic' elements. The PDP protection afforded in Chapter 26 will only apply to listed heritage sites (and immediate effects on those), leaving the wider streetscape and place values of the area unprotected, and vulnerable to loss of its distinctive character and place values. Furthermore, re-zoning of the subject area as HDR has a high potential in my opinion to create negative effects on its neighbouring heritage sites and their settings through increased building footprints and heights, including through dominance of these future buildings across what is in effect, a relatively small area. Such effects are rarely 'designed out' due to the very nature of their capacity-focused motivation.

CONCLUSION

19. Paragraphs 14, 16 and 42 of Ms Leith's evidence discusses the objectives and policies of the PDP in regard to HDR zones and concludes (para 42) that *'proximity of the subject sites to the QTC is the most important consideration in the zoning being applied to the area'*. Congruent with this, Chapter 3 - Strategic Direction of the PDP, specifically states in Policy 3.2.6.2.2 *'Enable high density housing adjacent or close to the larger commercial centres in the District.'* However, Goal 3.2.3 and its associated objectives and policies, acknowledges the importance of *'a quality built environment taking into account the character of individual communities'* which ensures *'development responds to the character of its site, the street, open space and surrounding area...'*. In terms of the overall approach to zoning the Park Street area, this goal also has particular importance and should be read in conjunction with the policy 3.2.6.2.2 emphasis on 'proximity' due to the high significance of the special character of the Park Street area and its significant relationships with the Queenstown Gardens, as previously discussed.
20. I do not advocate for a 'preservation' approach to the Park Street-Brisbane Street character area, rather a considered and creative approach to its future development and change that respects and compliments the individual character of its development, its cultural history, its low-key, residential community nature, and the positive balance it provides for the Queenstown Gardens and its communities. Its proximity to the QTC is a vital element in its streetscape and cultural value to the QTC, values that have the potential to be severely compromised if the Park Street area is re-zoned HDR.

Dr Andrea Farminer

7th July 2017