

Before the Hearing Panel

Under the Resource Management Act 1991 (**Act**)

In the matter of Variation to the Queenstown Lakes Proposed District Plan – Te Pūtahī Ladies Mile Masterplan

Summary of evidence of Erin Stagg on behalf of Sanderson Group and Queenstown Commercial Limited

14 December 2023

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1. On 20 October 2023 I filed a brief of evidence on behalf of Sanderson Group and Queenstown Commercial Limited (SG and QCL) (Submitter 93).
2. My evidence in chief included general commentary in relation to te Pūtahi Ladies Mile Masterplan Variation, addressing matters of interest to my clients in relation to the provisions of the variation.
3. I participated in expert conferencing on 2 and 3 November 2023 and signed the resulting Joint Witness Statement (the JWS).
4. I have read Council's rebuttal dated 10 November 2023 and the further amended plan provisions with the rebuttal of Mr Brown.
5. I consider that the proposed variation will enable the construction of a high quality urban environment with Te Pūtahi Ladies Mile (TPLM). Many of the points of disagreement have been resolved through the process thus far. However I retain some reservations with regard to a few of the provisions, as follows.

Residential Density

6. In my evidence, I raised concerns with the minimum density provisions and sought, instead, a minimum density of 40 dwellings per hectare gross or 60 dwellings per hectare net. In the expert conferencing, I agreed that the best way to approach this was a rule that required 60 dwellings per hectare net, noting that Mr Brown, Council's planning expert, did not agree to that amendment.
7. In his rebuttal, Mr Brown recommended that the density provisions for the HDR Precinct be amended to a gross density of between 50-72 dwellings per hectare. Mr Brown has also recommended that mechanisms be considered to enable the development of a portion of a block to a lesser density while retaining 10-20% of the developable area to accommodate higher density development in the future when it may be more feasible for the market.
8. I retain my opinion that a rule requiring 60 dwellings per hectare ***net***, which equates to 42-45 dwellings per hectare gross, would be the most effective and efficient way to provide for higher density development while still enabling flexibility. I do not

consider there needs to be a cap on the maximum density that can be achieved in the HDRZ. Further, I consider that the best way to achieve the development of higher density residential apartments would be by incentivising them. Incentives could include methods that sit outside the plan such as reduced development contributions and development contribution holidays, or incentives within the plan such as enabling a certain level of residential visitor accommodation as was agreed to during the joint witness conferencing. A retention of a requirement to build to a minimum density of 50 dwellings per hectare gross will delay development for potentially 10-20 years, or possibly result in that development never being realised. Alternatively, it could result in Council having to process several non-complying activity resource consents in relation to density breaches and this issue will, as a result, be assessed in an ad hoc manner through various resource consent hearings.

9. I note that Council's experts consider that the minimum density of the HDRZ be set at 50 dwellings per hectare for a number of reasons, including the uptake of modal shift, a provision of a mix of typologies, and maximising the development potential of TPLM. However the transport engineers have confirmed that modal shift occurs with density of 40 dwellings per hectare gross, and has diminishing returns resulting from densities greater than 40 dwellings/ha. I note that, prior to moving to New Zealand, I lived and worked in Aspen, Colorado. I cannot comment on the similarities or differences in relation to demographics and public transportation use. However, when I lived there in 2006-2008, there were no developments this dense and nearly everyone took the bus to work and into the town of Aspen, myself included. The high uptake of public transportation use was a result of having access to a frequent, high speed bus network that provided transportation along the main highway corridor in combination with restricted access to parking within the towns of Aspen and Snowmass.
10. Regarding the provision of a mix of typologies, I am of the opinion that Rule 49.5.16 could be worded in such a way that it requires a mix of housing typologies be provided while requiring a minimum density of 40 dwellings per hectare gross rather than 50. Alternatively, a new rule could be inserted into the plan, provided there is scope to do so, requiring percentages of housing typologies in each development.

11. Notwithstanding the above, I have read Mr Brown's latest version of Rule 49.5.16 circulated at the hearing on 6 December 2023 and consider that it would enable a pathway for developers to develop a large portion of their site to a density that would be commercially viable while also requiring them to set aside a portion to develop to higher densities should they become viable in the future. This would achieve the aim of the urban designers in maximising the development potential of the HDR Precinct, provided those higher density typologies become commercially viable in the future. I have included an updated version of that Rule with some amendments to make the implementation of this rule, in my opinion, slightly more straight forward, and include a matter of discretion relation to the provision of a mix of typologies.

Commercial Precinct

12. I consider that, given that the plan change is contingent on promoting a transportation mode shift, the expansion of the commercial area is warranted as it would provide more opportunities to live and work in the area. I also submitted that the maximum size of offices be increased from 200m² to 350m² to enable a greater diversity of businesses to establish in the commercial area.
13. Mr Brown, relying on the evidence of Ms Hampson, has recommended the commercial precinct be expanded from 2.17ha to 3.2ha. I agree that this is an appropriate extension, however consider that it would be more appropriate to extend to commercial precinct to the north rather than to the east. Extending the commercial precinct to the north would ensure that the area has continued frontage along the extension to Hawthorne Drive. Further, the land on the far northern side of TPLM is less desirable for residential development as it will be heavily shaded in the winter months by Slope Hill. I do note, however, that a portion of this areas has been included in the community park on the structure plan.
14. I retain my opinion that more flexibility needs to be enabled in relation to minimum office size within the commercial precinct. While I agree with Ms Hampson that not everyone who lives in TPLM will work in TPLM, and some people who work within TPLM will live elsewhere, I consider it important to enable the existing and future residents of the easter corridor to work within walking or cycling distance from their dwellings. While most office activities will likely be relatively small, some business may expand over time, or wish to establish larger offices in this location. Flexibility

in relation to office size will enable people and businesses to establish in the area with opportunities to expand in the future. I do not think this would undermine the functioning of neighbouring Frankton, which will continue to function as a primary commercial and office area.

Parking

15. In relation to parking, I consider the most appropriate method through which to ensure that the parking provision in TPLM is managed is by having neither a maximum or a minimum parking limit but rather allowing the market to decide.
16. Mr Brown has not addresses the maximum parking rules in his rebuttal, and did not agree to an increase in maximum parking limits, or the deletion of the maximum parking rules, at conferencing. While I acknowledge that Mr Shields is of the opinion that restricting parking availability within TPLM will support the required modal shift, I retain my opinion that parking provision within residential areas is most effectively managed by the market, as there are substantial inefficiencies in providing too much parking, both in relation to cost and opportunity cost. I agree that travel to work and school to be only a portion of travel needs. People will also want to access recreational opportunities, need to take their children to extracurricular activities and sport tournaments, as well as need to travel for medical purposes, social visits, or any other number of purposes. Given the nature of the District, and the fact that many required services are still located in Dunedin and Invercargill, I consider it likely most households will need to have at least one car if not more. I note that congestion on the State Highway is mostly restricted to peak travel periods.

Reserves

17. I accept the evidence of Ms Galavazi that Council wishes to retain the community park in the size and location as originally proposed as they consider this will best serve the needs of the community. However I still consider that enabling some flexibility with regard to park design and location would provide better outcomes. The current park location will be heavily shaded by Slope Hill, is often flooded by stormwater and has a road running through it. I note that when she spoke before the hearing Ms Galavazi considered there was sufficient flexibility within the provisions to enable flexibility with regard to park location and size, however I do

not consider that the provisions, as they stand now, enable flexibility with regard to the extent of the proposed parks. The proposed provisions require that development, parks included, be in accordance with the structure plan. This implies that there is no flexibility, although I note that Mr Brown is still working with the wording of Policy 49.2.1.1. Enabling general consistency with the structure plan with regard to park location and extent would achieve, in my opinion, sufficient flexibility.

Erin Stagg

14 December 2023