

**BEFORE THE INDEPENDENT
HEARINGS PANEL FOR THE
QUEENSTOWN LAKES PROPOSED
DISTRICT PLAN**

Under the Resource Management Act 1991

**In the matter of the Urban
Intensification Variation
to the proposed
Queenstown Lakes
District Plan.**

STATEMENT OF LAY EVIDENCE OF

BRUCE STEENSON

9 July 2025

MACTODD LAWYERS

Barristers, Solicitors, Notaries

Level 2, Remarkables House

26 Hawthorne Drive, Frankton

Queenstown 9300

P O Box 653, DX ZP95001, Queenstown 9348

Telephone: (03) 441 0125

Solicitor Acting: Jayne Macdonald

Email: jmacdonald@mactodd.co.n

Introduction

1. My name is Bruce Steenson. I reside at 30 Lismore Street, Wanaka. My wife and I, along with six of our neighbours are submitters and further submitters to the Urban Intensification Variation (**Variation**).¹
2. We have owned our property in Lismore Street for 13 years.
3. I grew up in Dunedin and Christchurch, and after a 35-year international career, my wife and I chose to build our retirement home in Wanaka. We returned to live here permanently in 2016. Throughout our adult lives, Wanaka has been a constant for us — a place we have visited regularly for both summer and winter holidays. We now have several family members in the town. We were drawn to Wanaka for its open, relaxed, and friendly character. It is a town that blends naturally with its environment rather than imposing itself upon it. This connection to place — both personal and environmental — is a major reason why we chose Wanaka as our long-term home.
4. The evidence does not repeat the matters addressed in our submission, but rather provides my comments on the s42A reports produced by the Council's consultants.

My Key Conclusions

Development Framed as an End in Itself

5. The tone of the Section 42A reports suggests that development is being pursued as an objective in its own right. There is little acknowledgement of the specific nature of residential development in Queenstown and Wānaka — particularly in the HDRZ and MDRZ — where high-yield, expensive dwellings/apartments will be the most likely outcome. These homes are often purchased by wealthy absentee owners and may sit empty for much of the year, or be used for visitor accommodation.

¹ OS 1135, FS 1319-1323

Lack of Focus on Affordable Housing

6. The form of development promoted by the Variation does not address the region's most pressing housing challenge: the lack of affordable housing for permanent residents and workers. In fact, in my opinion it may worsen the problem by removing older, more affordable dwellings from the rental market to make way for redevelopment. QLDC should instead be taking this opportunity to place far greater emphasis on enabling and incentivising affordable housing outcomes. In this regard I believe a significant opportunity has been lost to incentivise developers to provide affordable housing in exchange for increased development opportunity in appropriate locations.

Need for a More Targeted, Strategic Approach

7. A more thoughtful, less broad-brush intensification strategy is needed — one that focuses on enabling typologies and locations that **actually support the delivery of affordable housing**. High-density development should be concentrated in better-suited areas such as Frankton, Remarkables Park, Ladies Mile, and Three Parks — all of which are close to growing commercial centres and community infrastructure.

Protecting Character and Amenity in Sensitive Areas

8. Intensification done well would retain the distinctive character and amenity values that make places like Wānaka attractive and liveable. Over-zoning sensitive areas in pursuit of theoretical yield to developers risks sacrificing long-term community wellbeing and identity for short-term and unintended development gains.

Unclear Purpose of the Variation Given Surplus Capacity

9. The reports themselves acknowledge that the current District Plan already provides a significant surplus of development capacity — even under updated (May 2025) High+ demand projections. This raises a fundamental question: **What is the Variation actually trying to achieve?** The justification for further upzoning in already enabled areas appears weak in this context.

s42A Report - Amy Bowbyes

10. Her report rejects all submissions proposing the status quo or rejection of the Variation in its entirety and rejects all submissions seeking inclusion of the Operative District Plan in the Variation.
11. Her evidence records that the purpose of the Variation is to implement NPS-UD and in particular but not exclusively Policy 5.
12. Policy 5 requires enablement of development of urban areas well serviced by public transport or where there is high demand for housing relative to other areas in the Urban Environment. There is no public transport in Wanaka and I question the “high demand” for housing in Lismore Street/Lakeside Road.
13. At paragraph [5.25] Ms Bowbyes states that not implementing the Variation would not be lawful since it means not implementing the NPS-UD. This seems nonsensical because it assumes that the Variation as proposed is the only way to implement the NPS-UD.
14. At paragraph [5.28] she argues that the Variation assists with implementing the pORPS objective of meeting the greater of demonstrated demand for housing or the level of accessibility provided for by existing or planned active or public transport. Lismore Street and Lakeside Road do not have either demonstrated housing demand (as evidenced by developments proposed and not built in the past plus the current availability of land). It does not have any planned public transport. I accept it does however have active transport options and high accessibility to the town centre.
15. At paragraph [5.28] Ms Bowbyes also says that the Variation supports the requirement in the pOPRS to identify areas suitable for intensification. Arguably and in my opinion, areas such as Three Parks are far more suitable for intensification than the established areas of Wanaka because intensification through increased height would significantly harm the amenity values of the existing town for current and future generations whereas Three Parks is greenfield

semi commercial remote and close to newly built shopping and recreational centres.

16. The broad-brush approach of the Variation does not adequately address the need for affordable housing or consideration of existing amenity values and is therefore a poorly thought out attempt. In implementing the NPS-UD QLDC should, in my opinion, focus on enabling provision of affordable housing rather than sweeping changes across the board which will not realise the desperately needed housing. Unless adequately incentivised, developers are simply going to continue to provide expensive housing options which generate higher yields for them.
17. At paragraph [5.29] Ms Bowbyes comments that the strategic directions of the PDP requires that the character of individual communities be taken into account and that urban growth is managed in a strategic and integrated manner. The Variation as proposed **does not** do this because it allows heights that damage the essential and quintessential character of our small resort town and its community and do not integrate well with the small-town environment valued by the current community and future generations. It's a big part of why people come to Wanaka to live. We do not have the same intensification drivers as a big city.
18. At paragraph [5.36] Ms Bowbyes states that the 2021 HBA has concluded that there is sufficient plan enabled capacity to meet short, medium and long term demand growth. However, there is a shortfall of housing in the affordable price bracket. Additional intensification and development opportunity in Lismore Street / Lakeside Road is not going to contribute to housing in the affordable price bracket, nor in my opinion to housing affordability per se. Again, there is the opportunity to create housing in this bracket in Three Parks zone without compromising the character and amenity of the established town areas.
19. I find it odd, and worthy of further explanation as to why Queenstown growth is expected to be only 56% of the total growth whereas Queenstown had more than double the population of Wanaka in the 2024 census (28,600 vs 13,100) so Wanaka is expected to grow at a rate which is about 1.8 times faster than that of

Queenstown. Susan Fairgray notes this inconsistency with recent growth rates in Appendix A.

20. Commenting on Ms Bowbyes paragraph [5.41], the Wanaka Ward medium and long-term demand (with margin) in the May 2025 QLDC projections are 4,300 and 12,400 units respectively. The stated commercially feasible capacities **without the Variation** are 19,500 and 19,500 respectively. **The forecast capacity seems to be significantly in excess of demand.** Figure 4 also introduces a new capacity metric of Reasonably Expected to be Realised (RER) capacity of 2900 (medium) and 7700 (long-term) for the Wanaka Ward based on the 2021 HBA but doesn't give 2025 projections. The main constraint on RER seems to be infrastructure availability.
21. The largest increases enabled by the Variation are expected to be in attached dwelling typologies. **Again, in my opinion these should be in new areas with more easily delivered infrastructure such as Three Parks and focus on affordable housing.**
22. Ms Bowbyes acknowledges at paragraph [5.54] the expected shortfalls in lower dwelling value bands in the short-medium term and challenges in housing affordability. Again this only serves to reinforce the points I make above.
23. At paragraph [5.55] Ms Bowbyes acknowledges that the Variation will not necessarily add a significant number of new affordable dwellings in the lower value bands. It makes a weak argument that increases in housing affordability are likely to increase gradually over time as more dwellings are constructed.
24. From paragraphs [6.18] – [6.23] Ms Bowbyes argues that existing residents' views on character and amenity are subservient to QLDC intent towards intensification. However a more focussed and more carefully considered Variation could in my opinion enable intensification without significantly degrading and adversely affecting the amenity and character of the town as a whole, while providing affordable housing. For example, by focussing on new areas such rather than broad brush approach to intensify HDRZ's and MDRZ's.

25. At paragraph [7.4], Ms Bowbyes refers to the s32 report and the options for intensification that were considered. Essentially just changes to HDRZ and MDRZ and increase to height and set backs appear to have been considered. This seems inadequate to me. Further there is insufficient explanation of why areas in the operative plan were not also considered.
26. At paragraph [7.21] Ms Bowbyes argues that increasing housing supply will increase housing affordability. Again, however it will not create affordable housing unless affordable housing is specifically targeted and built. In this regard I note at paragraph [7.22] she acknowledges that Susan Fairgray's analysis does not suggest that the Variation is likely to produce affordable housing.
27. Finally, Ms Bowbyes argues that infrastructure constraints should not be a barrier to intensification if infrastructure can be upgraded in the future. There appears however to be no consideration of the cost of upgrading infrastructure. In my opinion, some view on how bottlenecks in infrastructure can be alleviated are necessary before agreeing to intensification in particular areas. In this regard, a greenfield environment such as Three Parks is going to be easier to install appropriate infrastructure than in older developed areas of Wanaka.

Statement of evidence - Cameron Wallace, Urban Design

28. At paragraph [9.3], Mr Wallace states “Various submissions seeking reductions in permitted building heights, density controls and /or maintaining the status quo would conflict with the design outcomes expressed through the objectives and policies of the HDRZ.” I find this to be a very broad statement such that it is almost meaningless. The current objectives and policies for the HDRZ must be reflected in the current rules (the so called ‘top down approach’). The proposed changes to objectives and policies likewise will be reflected in the changes proposed to the rules by the Variation.
29. At [9.4] he states “*However, I do also note that increased building heights may also have the impact of obscuring or blocking views (and amenity) enjoyed by existing residents. The extent to which this actually occurs in reality is difficult to quantify as part of this process as many sites will remain as they are today or*

alternatively may not develop to the full potential enabled.” This seems to be a circular and self-serving statement to me. What he is saying is because there is no actual building proposed, it's difficult to define the impact and therefore existing residents cannot object at the moment and won't be permitted to object in the future if a development complies with the new rule framework.

30. The impact of the new framework should be assessed now on the basis of what it could possibly enable in the way of adverse effect to existing residents' amenity. The argument is “don't worry, it may never happen” and should be *“It could happen so let's set the rules now to prevent unconstrained adverse effects on amenity in the future”*.
31. At paragraph [9.10], he states “the majority of sites within the notified HDRZ feature lot widths of around 15-21m, and therefore would not allow much floor space at higher levels because of setback requirements”. This does not address the scenario where lots may be combined into one development.
32. At paragraph [9.12] he proposes to increase allowable heights in Three Parks to 20m. In my opinion, this supports the argument that increasing density in greenfield areas such as Three Parks would be preferable to changing the character in established areas of town by increasing heights to 3+ storeys. At paragraph [12.4] he also supports a height of 20m for BMUZ in Three Parks which is consistent.
33. At paragraph [9.15] Mr Wallace seems to ignore the possibility of combining blocks and thereby having no setback between buildings on amalgamated blocks. I would be concerned if there were no provision which would stop building a continuous apartment block along the area one block back from Lakeside Road and creating an impenetrable monolith in front of Lismore Street properties.
34. At paragraphs [15.5] – [15.6] he discusses submissions proposing to restrict intensification to new development areas such as Three Parks and concludes that this would be inconsistent with the NPS-UD objective of enabling a greater variety in typologies in terms of location, size and cost. As I have set out above,

in my opinion, intensification should be firstly aimed more at providing affordable housing in Queenstown/Wanaka and this is not going to happen in areas close to the town centre. Rather, it is going to be more practicable in greenfield sites where land values are lower and accommodation aimed at a lower price point will be more affordable as a result. This is particularly relevant where newly built commercial and recreational infrastructure have just been created. I don't believe that the NPS-UD requires the broadbrush approach that QLDC has taken.

35. At paragraphs [15.30] – [15.31], Mr Wallace addresses the area between Lakeside Road and Lismore Street. He acknowledges that the Variation poses a threat to existing amenity (private views and some public views). He goes on to argue that the existing single storey housing development on Lismore Street already interfere with views from Lismore Park, but that Lismore Park rises in topography to the extent that public views from the park would not be limited by increased development potential.

36. This 'dismissal' of amenity impact is simply minimising legitimate concerns of existing residents. It frames concerns about **private amenity views** as secondary and **non-specific**. However:

- **Private views and visual amenity** are legitimate **components of residential amenity**, particularly in a high-amenity tourism town like Wānaka.
- The suggestion that private view loss is less important because of "existing single storey development" ignores the **cumulative impact** of replacing one-storey homes with 12m buildings across multiple lots.
- The Variation fails to consider that **Wānaka's appeal relies heavily on visual access to its natural landscape** — both for residents and tourists. The view lost near the lakefront will undermine that identity.

37. Mr Wallace also argues that there will be enough 'gaps' between buildings such that existing private views will not be completely lost and that increased building heights could also enhance some amenity values by increasing access to views and

sunlight for individual (**new!**) developments, or providing for greater numbers of housing close to services.

38. The assumed *amenity gain* is speculative and uneven. The suggestion that **increased height could improve views or sunlight** is highly contingent:

- Any **gain in views for new upper-storey dwellings** will be at the **cost of views for existing neighbours and passers-by**.
- **Access to sunlight** could be reduced for adjacent properties, especially in winter, due to longer shadows — especially given the zone's west-facing slope and southern latitude.
- The **housing supply justification** is weak in this specific context. There is **no demonstrated constraint on zoned capacity** in this area; Wānaka already has significant undeveloped MDRZ and HDRZ capacity.
- The conclusion that height limits are “appropriate” is **not supported by a site-specific urban design, landscape, or visual impact assessment**.
- The area is **highly sensitive**, given its proximity to the lake, town centre, and key open spaces. The Variation should provide **detailed local evidence** rather than rely on generic zoning logic.

Statement of evidence – Richard Powell – 3 Waters

39. Mr Powell’s evidence generally supports intensification in greenfield areas because it is easier to provide the infrastructure required. He specifically supports intensification in Three Parks because of existing and planned infrastructure.

Statement of evidence – Susan Fairgray - Economics

40. In her executive summary at paragraph [2.3], Ms Fairgray argues that the proposed increase to development capacity is likely to increase gradually

delivering an increased number and range of dwellings through time in comparison to that encouraged to occur under the current PDP provisions. She opines that changes to the dwelling mix are likely to gradually increase housing choice and affordability.

41. However, in my experience, in high-demand lifestyle/tourism towns like Wānaka, new dwellings tend to be expensive and tailored to investor or second-home markets, not affordability. Intensification often results in high-spec developments, not modestly priced homes for local workers or families.
42. Without specific affordability mechanisms (e.g., inclusionary zoning, targeted incentives, or land release), increased capacity alone will do little to moderate prices. This will be particularly the case in expensive land areas close to the lake.
43. If indeed, the expected uptake is “gradual,” then the need for immediate, widespread intensification provisions is questionable — especially where it risks adverse amenity and infrastructure strain.
44. The current PDP already enables medium-to high-density development in appropriate areas. Targeting areas outside the established town area and a staged approach would allow responsiveness without adversely affecting the amenity which makes the area so attractive.
45. At paragraph [2.5], she acknowledges that the development capacity enabled is **very** large in comparison to projected demand in most locations.
46. At paragraph [2.9(b)] she supports further increasing enabled height within the HDR Zone in Queenstown, Wanaka and Three Parks. *“It would increase the feasibility for commercial developers to deliver higher density dwellings, which would have economic benefits for housing supply in these locations”*. I do not believe this will be the outcome at all, and I refer in particular to Mr Vivian’s evidence in this regard addressed to the much more likely uptake of the additional development capacity by plan enabled visitor accommodation. I am also sceptical that this will simply result in the provision of holiday homes for wealthy people in Auckland and Sydney and which would be empty for much of the time. It will

again do nothing for the affordable home problem or housing affordability in general.

47. At paragraph [4.24] Ms Fairgray suggests that commercially feasible development could be 54,700 dwellings over the district. However, Figure 3 in the s42A report of Ms Bowbyes shows a demand of only 27,900 dwellings in the QLDC May 2025 (sometimes referred to as April 2025 by Ms Fairgray) long term total demand with margin. I question how the level of *commercially* feasible development can be 96% higher than the demand projected. Surely supply and demand would rule this out.
48. Figure 4 shows significant excess long-term capacity with the current PDP across the board with the possible exception of Wanaka terraced housing. Interestingly the current PDP shows an expected significant excess of apartment dwellings in Wanaka.
49. At paragraph [5.7] Ms Fairgray states “I also consider that in areas where upzoning has occurred, the large increases in yield are likely to substantially increase the potential returns from redevelopment of sites for the commercial market.” It is not clear here what the focus is – financial returns for developers or affordability of housing. Again, this illustrates a lost opportunity for QLDC to have incentivised the provision of affordable housing where such ‘large increases in yield’ are essentially a ‘gift’ to the current landowner, developer and/or patient speculator.
50. At paragraph [7.2] Ms Fairgray acknowledges that the Variation may not have any impact on availability of affordable housing,
51. At paragraph [8.17] she discusses the Lismore Street and Lakeside Road submissions, saying *“I consider that limiting height to 8 metres would reduce the feasibility of more intensive typologies in this location. It would restrict development of terraced housing, which would be well-aligned with patterns of relative demand and would consequently limit housing choice in this location.”*
52. In my experience however, two-storey terrace housing, including 2, 3 and even 4 bedroom units, is commonly designed within an 8m height limit in many towns

and cities across New Zealand. Modern architectural design, slab-on-grade construction, and roof articulation allow for efficient, attractive, and compact housing within 8m. Claiming terraced housing is not feasible under 8m is not supported by current development practice.

53. The Lismore Street / Lakeside Road area occupies a highly visible and elevated position overlooking Lake Wānaka and the town centre. Development here has significant visual impact — affecting both private residential amenity and public views from the Lismore Park, lakeside path, the town centre and Pembroke Reserve. Maintaining an 8m height limit is a balanced approach that enables intensification while respecting landscape character, visual coherence, and community expectations. It avoids the potential of dominant, imposing monoliths changing the character of the town.

Concluding comment

54. The Wānaka community has consistently expressed concern about overdevelopment and the loss of views, sunlight, and small-town character. In a town where tourism, recreation, and visual amenity are core to its economy and lifestyle, planning decisions must favour long-term environmental coherence over short-term development volume.

Bruce Steenson

9 July 2025