

under: the Resource Management Act 1991

In the matter of: Submissions and Further submissions
on the Queenstown Lakes
Proposed District Plan

and: Urban Intensification Variation

and: Scenic Hotel Group Limited
(Submitter 763)

And
Queenstown Residential Group Limited
(Submitter 764)

And

Scenic Hotel Group Limited
(Further Submitter 1344)

And
Queenstown Residential Group Limited
(Further Submitter 1346)

1.0 Introduction

- 1.1 My full name is John Bernard Edmonds.
- 1.2 I hold the qualification of a Bachelor of Regional Planning from Massey University. I am a full member of the New Zealand Planning Institute.
- 1.3 I have 34 years' experience in planning and resource management roles, including strategic planning, master planning, urban design, policy development, project management and other resource management consultancy services. I have worked in both local government and private sector roles.
- 1.4 My previous roles include five years at Nelson City Council and six years with the Queenstown Lakes District Council (QLDC), most of that time (1997-2001) as the District Planner.
- 1.5 In January 2001 I went into private consultancy, establishing John Edmonds & Associates. In this role I have managed planners, environmental scientists and more recently surveyors and project managers. I have been personally responsible for master planning, strategic planning, preparing resource consent applications and assessments of effects, and been the principal consultant assisting with planning and environmental issues for a range of significant local developments. I have also presented evidence at Council and Environment Court hearings.
- 1.6 I am familiar with submission 763 and 764 on the Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and further submissions 1347 and 1348.

2.0 Code of Conduct

- 2.1 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.

3.0 The Submitter and Site Context

- 3.1 This evidence is prepared in respect of two submissions prepared on behalf of related entities that own two separate blocks of land within the same neighbourhood.
- 3.2 Scenic Hotel Group Limited (SHG) owns the block of land located between 25 to 31 Stanley Street and 30 to 40 Melbourne Street which comprises approximately 6,000m². This land contains the Heartland Hotel which includes 81 guest rooms, restaurant, bar and conference rooms.
- 3.3 Queenstown Residential Group Limited (QRG) owns 17 and 21 Melbourne Street which comprises approximately 1,800m². These sites adjoin one another and contain stand-alone single storey dwellings.
- 3.4 Both blocks of land are zoned High Density Residential under the Proposed District Plan and that zoning is not proposed to be changed by the Variation.

4.0 The Submissions (763 and 764)

- 4.1 The submission points are identified in the table below.

Submission #	Summary	S.42a Recommendation
763.1 764.1	That the Variation is generally supported subject to the amendments identified in the submission.	Reject
763.2 764.2	That the 8th paragraph of the Zone Purpose is amended as follows: 'adverse effects of <u>visitor accommodation activity</u> on the residential amenity values of nearby residents is avoided, remedied, or mitigated'.	Reject
763.3 764.3	That Objective 9.2.1 is amended as follows: 'High density development <u>housing development</u> occurs in urban areas close to town centres, to provide greater housing	Reject

	diversity and respond to expected population growth.'	
763.4 764.4	That Objective 9.2.2 is amended as follows: ' High density residential development <u>Development</u> provides a positive contribution to the environment through quality urban design.'	Reject
763.5 764.5	That Objective 9.2.3 is amended as follows: ' High density residential development <u>Development</u> maintains a minimum level of existing amenity values for neighbouring sites as part of positively contributing to the urban amenity values sought within the zone.'	Reject
763.6 764.6	That the definition of habitable room 'is amended to ' <u>Any room in a residential unit or visitor accommodation unit that exceeds 8m², except for a garage, hallway, stairwell or laundry</u> .'	Reject
763.7 764.7	That a new definition of Principal Habitable Room being ' <u>that habitable room within a residential unit or visitor accommodation unit with the largest floor area</u> .'	Reject
763.8 764.8	That rule 9.5.8 (a) be amended to read 'The <u>Principal habitable room</u> principal living room/ space must have an outlook space of a minimum dimension of 4m in depth and 4m in width.	Reject
763.9 764.?	That the variation be amended as requested in the submission, together with any alternative, additional, or consequential relief necessary or appropriate to give effect to the matters raised in the submission and/ or the relief requested.	Reject

5.0 Details of Submissions in Contention

- 5.1 The primary point in contention is 763.5 and 764.5.
- 5.2 Submission 763.2 and 764.2 relate to the last paragraph of the Zone Purpose. I accept that my suggested additional wording is not necessary. In hindsight this paragraph would however be improved by removing the reference to the location “....near the town centres and within Arthurs Point”, as the explanation of where the HDR’s are located is explained in the first paragraph of the Zone Purpose.
- 5.3 In respect of the submission 763.2 to 763.4 (and 764.2 to 764.4), the Council officer recommends changes to Objectives 9.2.1 and 9.2.2 that generally corresponds with the relief sought.
- 5.4 Submission 769.3 and 764.3 requested that Objective 9.2.3 be amended by removing any reference to ‘existing’ amenity values.
- 5.5 The s42a report does recommend changes to the proposed objective by:
- Replacing ‘High density residential’ with ‘development’ and
 - Replacing ‘maintains a minimum level of existing amenity values with ‘maintains an appropriate level of existing amenity values’
- 5.6 I agree that ‘maintaining an appropriate level of amenity values’ for neighbouring sites recognises and anticipates change will occur.
- 5.7 However, I consider that retaining the term ‘existing’ within Objective 9.2.3 conflicts with the proposed zone standards that increase building height and other changes focused on intensification. The character of these high-density neighbourhoods is set to change, and the amenity values will also differ as a result. It is appropriate the objectives and policies look towards a future environment.
- 5.8 Retaining the term ‘existing’ in Objective 9.2.3 (as per the s42a report) suggests, for example, that residents occupying High Density Residential zoned sections with a single level family

home might expect that their amenity values, which are informed by the degree of privacy, shading, overlooking and access to sunlight, should remain unchanged.

5.9 Submissions 963.6 to 963.8 (and 764.6 to 764.8) relate to the new Outlook Space provision (proposed rule 9.5.8).

5.10 The outlook space of a unit will almost always (or should) adjoin the living room, and typically the living room is the largest individual floor space within a unit. The submission suggests codifying that by defining the principal habitable room and requiring the outlook space be aligned.

5.11 I also note that the current wording of the Habitable Room definition is prone to misinterpretation, by including references to the intended function of a room. I expect this type of definition could lead to administrative uncertainty.

5.12 I consider the definition in the original submission is more appropriate.

6.0 Further Submissions

6.1 The submitters have made further submissions; all in support.

Original Submission	Further Submission	Support or Opposition
986.12 Pro-Invest NZ Property 1 Trust Limited Partnership	1347.1 1346.1	Support
1008.12 Ashourian Partnership	1347.2 1346.2	Support
1010.1 ABF Family Trust	1346.2	Support

6.2 Both Pro-Invest NZ Property 1 Trust Limited Partnership and Ashourian Partnership seek the height limit to increase to 18.5m for the block of land bound by Frankton Road, Coronation Drive, Melbourne Street and Beetham Street.

- 6.3 Both SHG and QRG made a further submission in general support of those increased heights, however, they did not support any increased height for the two parcels of land on the opposite side of Stanley Street from SHG (ie. The Presbyterian Church site).
- 6.4 SHG and QRG now amend their Further Submissions by rescinding that limited opposition and instead support both the Pro Invest and Ashourian submission in full.
- 6.5 I consider that an 18.5m height limit through this precinct would be appropriate, as there is a recognised predominant concentration of hotels and visitor accommodation in this area. Any breach of that height limit would be addressed through a Restricted Discretionary consent, in the same manner as other High Density Residential neighbourhoods.
- 6.6 I note the land owned by SHG would be inside that precinct, whilst the QRG land is on the opposite side of Melbourne Street and would not benefit from inclusion in a new precinct.
- 6.7 I suggest that the amended wording of this rule refer to a new height precinct that would be identified on the planning map.

9.5.1.1A Within the area specified on the District Plan web mapping application within the block bound by Frankton Road, Coronation Drive, Melbourne Street and Beetham Street a height of 18.5 metres.

8.0 Conclusion

- 8.1 It is my opinion is that the amended objectives, policies and rules that provide for intensification of the High-Density Residential zone are generally appropriate. However, I maintain my opinion that further change is necessary in respect of Objective 9.2.3, and that the rules and definitions surrounding Outlook Spaces could be improved upon. I also consider that a separate height precinct close to the centre of Queenstown that provides the opportunity for additional height is appropriate and will implement the objectives and policies of the PDP.

John Edmonds

Dated 4 July 2025