

**BEFORE THE INDEPENDENT HEARING 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

JOINT WITNESS STATEMENT

URBAN DESIGN

16 July 2025



Sarah Scott / Shanae Richardson
T: +64 3 968 4018
sarah.scott@simpsongrierson.com
shanae.richardson@simpsongrierson.com
PO Box 874 Christchurch

1. BACKGROUND

1.1 This joint witness statement relates to the proposed Urban Intensification Variation (**UIV**) to the Queenstown Lakes Proposed District Plan (**PDP**). The UIV seeks to make a number of amendments to the provisions of the PDP to give effect to the National Policy Statement on Urban Development 2020 (**NPS-UD**). The relief sought by various Queenstown based submitters (Ref. 652, 653, 654, 832, and 835) is set out in the evidence in chief of Paula Costello dated 4 July 2025.

1.2 The attendees to conferencing are:

- (a) Paula Costello for multiple submitters; and
- (b) Cameron Wallace for the Council.

1.3 No other witness attended for any other party.

1.4 All attendees have read, and agree to abide with, the Code of Conduct for Expert Witnesses included in section 9 of the Environment Court Practice Note 2023.

2. RECESSION PLANES IN THE LOWER DENSITY SUBURBAN RESIDENTIAL ZONE

2.1 PC set out general concerns and issues with removal of sloping site exceptions for recession planes in the LDSRZ. PC notes that the topography of Queenstown means that buildings are generally orientated toward the lake (generally in a south or south-east direction) away from buildings on adjacent sites. This means that existing outdoor living spaces are also generally orientated in this direction and are less sensitive to issues the recession planes are seeking to address. CW concurred with this observation.

2.2 CW expressed some concern that the definition of a sloping site starting at one sloping at least 6° wasn't particularly steep or impacted by the UIV recession planes so it wasn't clear why a different effects envelope was necessary. PC noted that typical LDSRZ sites in Queenstown are typically steeper than 6°. Both experts agreed that the recession planes proposed, particularly along southern boundaries on steeper sloping sites (e.g. 20°), have the potential to be overly restrictive.

- 2.3** Considering the minimal changes to the LDSRZ as a whole, both experts agreed that retaining recession plane exemptions for sloping sites within the LDSRZ was generally appropriate. However, this exemption would benefit from re-inclusion of the former limits on accessory buildings located within a boundary setback to avoid overly bulky and large accessory building at the boundary of sloping sites. Specifically, the re-inclusion of the following limitation on sloping sites:

“...no part of any accessory building located within the setback distances from internal boundaries shall protrude through recession lines inclined towards the site at an angle of 25° and commencing at 2.5m above ground level at any given point along each internal boundary”

- 2.4** Both experts considered that there was general scope based on the submissions to make the above change, but that this would need to be considered by Counsel in advance of the hearing.
- 2.5** Both experts agree that there are a range of other development standards (e.g. density limits, building coverage, building length, building setback) which combine to deliver appropriate built form outcomes and off-site amenity within the LDSRZ.

3. RECESSION PLANES IN THE MEDIUM DENSITY RESIDENTIAL ZONE

- 3.1** Both experts agreed that the additional development envelope enabled within the MDRZ by the UIV, that some control of development through recession planes remains appropriate. PC noted that the biggest concern comes on steeper sloping sites with the lower recession plane proposed along a southern site boundary.
- 3.2** PC also notes that some MDRZ sites have retained a permitted height limit of 8m under the UIV and do not benefit as much from the more enabling provisions.
- 3.3** PC also notes that proposed increase in height limits cannot be sufficiently realised on steeply sloping sites, given the limiting effect of the proposed recession plane, or not without significant earthworks. PC and CW discussed that a change to recession planes that apply to sloping sites potentially reduces the extent of

earthworks required to accommodate viable building footprints. PC noted that there are wider benefits to this in terms of reduced cost of development and reduction in potential noise impacts associated with more extensive earthworks.

3.4 As stated in paragraph 2.1, PC noted that buildings in Queenstown tend to be orientated towards the south / south-east to take advantage of elevated views of the lake. As such the proposed recession planes have less relevance in terms of building bulk / visual dominance as buildings tend to be orientated away from the northern boundary already. It was agreed that the situation for the MDRZ in Wānaka is different less consistent with potentially more MDRZ located on flat land and/or with a number of sites orientated to the north towards the lake (albeit generally elevated above rather than below adjacent sites).

3.5 PC noted that an amendment to a 4m + 60° recession plane applying to the southern boundary of sloping sites is comparable in scale to the existing allowable built form outcome in relation to neighbouring properties, being a building at (permitted) 8m height complying with the setback. In this respect the amenity outcome remains the same. CW concurred with this assessment.

3.6 Both experts agreed that the application of a 4m + 60° recession plane from the southern boundary of a sloping site in the MDRZ would be appropriate in urban design terms.

Dated 16 July 2025



Signature of expert witness for Council



Signature of expert witness for various Queenstown based submitters