BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE QUEENSTOWN LAKES DISTRICT COUNCIL

UNDER the Resource Management Act 1991 (RMA)

IN THE MATTER Variation to Queenstown Lakes Proposed District Plan - Urban Intensification under Schedule 1 of the Resource Management Act 1991.

STATEMENT OF EVIDENCE OF ROLAND BRUCE HARLAND – URBAN DESIGN ON BEHALF OF ALISTAIR HEY, CARL SMILEY, BARBARA JARRY AND DUNCAN & TEIJA BOSCOE
04 July 2025

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Introduction

1 My name is Roland Bruce Harland.

2 I am an Urban Designer and Planner and hold the position of Director at Harland Urban Design & Planning. I have been in this position since October 2025 and have over 35 years of planning RMA and Urban Design experience.

3 I have been asked to provide evidence by Vision Planning on behalf of submitters; 281 Alistair Hey, 581 Carl Smiley, 651 Barbara Jarry and further submitter 1381[1] (in support of 281) Duncan & Teija Boscoe. The land covered by these submissions is referenced as the Subject Land in my evidence and the area requested to remain Lower Density Suburban residential (LDSR) is identified Figure 1 of my evidence.

Qualifications and experience

4 My qualifications include a Bachelor of Town Planning from the University of Auckland (1988) and a Master of Urban Design (Honours - 2010) from the University of Auckland. I am a member of the Urban Design Forum Aotearoa.

5 I have worked as a planner and urban designer on a wide range of consent and policy projects over the past 37 years in New Zealand and London. This has included leading the strategic planning, masterplan, plan variation and implementation of the Flat Bush new town project (approximately 1500ha and 40,000 people) when I was a senior planner and Flat Bush manager at Manukau City Council.

6 More recently I was the project director of the consortium of consultants (known as Ladies Mile Consortium or LMC) consisting of Candor3, Brown and Company Planning and Studio Pacific Architecture that was engaged by QLDC to undertake the master planning and prepare plan provisions for the Ladies Mile area commencing in 2020. This project took a number of years to complete and was made operative on 6th of December 2024.

7 I led the consultant team that wrote the plan variation to the PDP for QLDC to remove minimum parking standards in response to the NPS-UD in 2021.

8 I was QLDC Principal Policy Planner in 1996/97 where I was responsible for the District Plan review and hearings of submissions. This experience along with more

[1] Late submission accepted 4 June 2025 (Minute 2 'Hearing Panel Direction: Late original submissions and late further submissions')

recent Queenstown experience has given me a good understanding of the growth challenges facing the District.

9 I have also been involved in providing urban design reviews and/or input of resource consent applications for a variety of public and private clients including for the Queenstown Lakes District Council.

Code of conduct

10 I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023. Accordingly, I have complied with the Code in the preparation of this evidence, and will follow it when presenting evidence at the hearing. Unless I state otherwise, this assessment is within my area of expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of Evidence

11 My evidence addresses the following:

(a) Locality description and context for the submitters

(b) The Urban Intensification Variation (**UIV**) in terms of the Star Lane, Peregrine Place, and Hensman Road locality

(c) Site Context

(d) Rationale for QLDC to rezone the land subject to submissions

(e) Assessment of the proposed UIV in terms of the subject land and proposed zoning

(f) Demand and Commercial Feasible Capacity by Attached/Terrace and Apartment Typologies in Urban Queenstown

(g) Alternative Relief

(h) Conclusions

The key documents I have used, or referred to in preparing this statement of evidence are:

(a) The QLDC, Urban Intensification Variation (UIV) to the PDP

(b) QLDC's Section 32 evaluation Report

(c) The National Policy Statement on Urban Development, updated May 2022 (**NPS-UD**)

(d) QLDC notification online document 'Story Maps' [Found at: https://storymaps.arcgis.com/collections/ba8f492cceb74e2f812a79455fddc48c]

(e) The Queenstown Lakes Spatial Plan, July 2021

(f) Queenstown Lakes District Council, Proposed District Plan (**PDP**)

(g) s42A Evidence of Amy Bowbyes – Strategic Overview

(h) s42A Evidence of Cameron Wallace

(i) s42A Evidence of Ms Rachel Grace Morgan – Rezoning Requests for the Residential Zones

(j) s42A Evidence of Susan Fairgray

Executive Summary

12 Based on my evidence I have come to the conclusion that the application of the Medium Density Residential Zone (MDRZ) to the subject land is inappropriate and should be retained as Lower Density Suburban Residential (LDSR) as outlined in the submissions and discussed in my evidence. In particular, I concur with the Council's own evidence that the subject land is poorly located in terms of accessibility and that the area also scores 'low' in Council's Relative Demand Bivariate Analysis.

13 The implications of applying the UIV to the subject land as currently proposed are substantial in terms of allowable heights and density and these changes will have a significant impact on the amenities of the locality enjoyed by these residents. As part of a well functioning urban environment, it is important to retain a mixture of housing types throughout the district and within more localised neighbourhoods that are outside highly accessible and high relative demand locations. The proposed up zoning to MDRZ will increase development potential and including in inappropriate locations that have low accessibility and relative demand. There will be an unnecessary loss of amenity for the submitters' properties, namely outlook and privacy, due to the effect of high buildings being enabled on the adjoining MDRZ land.

UIV in terms of the Star Lane, Peregrine Place & Hensman Road locality

14 I have been engaged by original submitters 281 - Alistair Hey, 581 - Carl Smiley, 655 -Barbara Jarry and further submitter 1386 Duncan & Teija Boscoe to provide urban design evidence in relation to their submissions to the UIV. The location of these submitters and further submitter are shown on the following Figure 1 below. The

base map is taken from the notified UIV proposed zoning maps. The area highlighted in red (hereafter referred to as the subject land) is the area that the submitters seek to be retained as Lower Density Residential Suburban Zone (**LDSR**) as per PDP, noting that the submitters land is not proposed to be changed by the UIV. The area of MDRZ within the highlighted red area is approximately 3.0ha

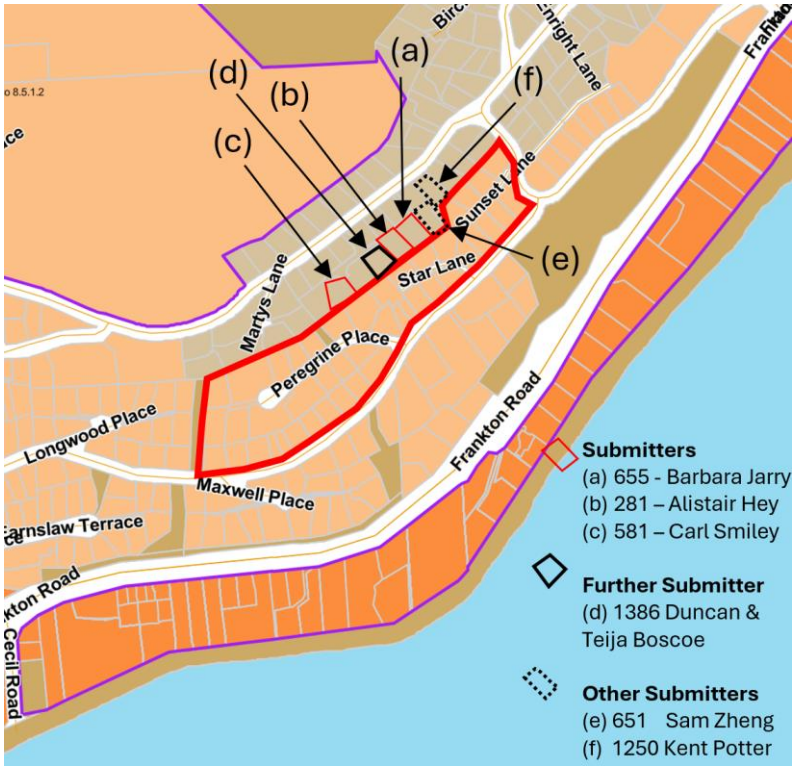

Figure 1: *Urban Intensification Variation Proposed Zoning with Area to be retained as Lower Density Suburban Residential in red (fat line)*

15 I note that the Council is a tier 2 territorial authority and is required to implement Policy 5 of the NPS-UD. Council, however is not required to implement the Medium Density Residential Standards, which are only required for Tier 1 Local authorities. This gives considerably more flexibility for the Council to apply a more nuanced zoning and detailed rules provisions that respond to the unique and highly valued urban environments found sitting high above the Frankton arm part of Lake Whakatipu.

16 In respect of the subject land the main areas of concern proposed by the UIV are outlined in detail in the submissions and include:

- The proposed rezoning of the land from LDSR to MDRZ.
- The effects resulting from the additional density, bulk, and location of buildings that would be enabled at the interface with the submitters land under the MDRZ.

- The relief sought by the submitters is that the subject land be retained as LDSR or, if that is not accepted, to apply a more nuanced approach to the interface between the zone boundary between the submitters' land and the MDRZ land on Star Lane and Peregrin Place.

Site context

Locality description

The area in question is shown on the following Figure 2, which shows the relative context and location and the comparison of the PDP and UIV zonings. The area highlighted in red is the area that is proposed to be retained as the lower density residential and is where the submitters I represent are located.

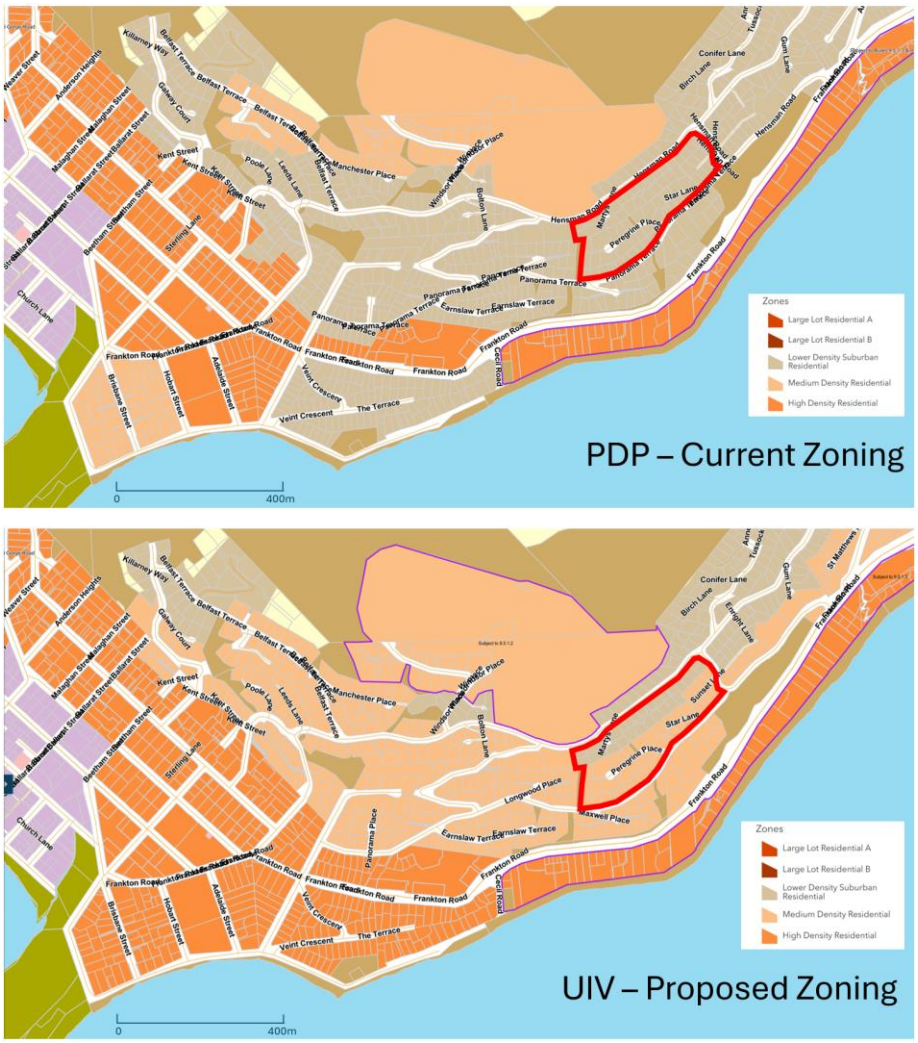

Figure 2: *PDP and UIV zoning comparison. Area highlighted in Red is proposed to be maintained as LDSR*

17 A more detailed map of the submitter's respective properties is included as Figure 1 above. The area of interest sits high on the hill above Frankton Road, with steep

circuitous roading access coming via Suburb St and Panorama Terrace to the west or Hensman Road to the east. Some of the gradients on these local residential streets are over 17% which is considered very steep. The area had been developed over the past 40 years with mostly standalone housing that typically spans 2-3 levels taking advantage of the steep sloping nature of the land and the expansive views generally to the south. Extensive views across Lake Whakatipu and to wider mountain ranges such as The Remarkables and Cecil Peak are significant amenity features that are highly valued by residents in this locality and from public streets. As discussed in detail in paragraphs 25-37 of my evidence the subject area is circa 2km from Queenstown Town Centre, which is a steep and challenging walk that is well outside typical 5-10 minute walking distances of 400-800m[2]

18 Star Lane and Sunset Lane are 6m wide privately owned lanes, with Star Lane having a narrow 4.4m (measured from kerb to kerb on site) formed carriageway and no footpath, and Sunset Lane having a narrow 4.9m formed carriageway (kerb to kerb from Council's GIS) and no footpath. Peregrine Place is a 12m public road with a 7.2m formed carriageway and a footpath of 1150mm.

19 Within the subject land sought to be retained as Lower Density Suburban Residential the land rises steeply from Panorama Terrace with Peregrine Place and Star Lane and Sunset Lane forming mid block terraces as the land continues to climb steeply to Hensman Road. The vertical elevation change ranges from 28m to 50m depending on location.

Rational for QLDC to Rezone the area and my Analysis in relation to the Submissions

20 The rezoning of the area is addressed in the original s32 analysis which looked at a number of factors including the strategic direction for managing growth as contained in the Lakes Spatial Plan and the accessibility and relative demand across the district to assist with determining appropriate zonings to implement the NPS-UD. The long term strategic direction for managing growth is outlined Queenstown Lakes Spatial Plan 2021 and is a multipronged approach that includes intensification in and around town centres, generally limiting greenfield growth to the southern and eastern corridors and promoting growth along the Queenstown to Frankton corridor. This

[2] Based on the 85th percentile walking speed of 1.3m/s. Waka Kotahi. (2009) Pedestrian Planning and Design Guide, Section 3.4

document is currently being updated and will essentially become the Future Development Strategy (**FDS**) required by Subpart 4 of the NPS UD.

21 Mr Wallace summarises in 4.1 of his s42a evidence how the demand and accessibility analysis has been applied to determine upzoning of land and associated controls relating to height and density of development. He states that "in its most simplified form, the process identified those areas with the greatest level of accessibility and / or demand and sought to apply more intensive zonings in these locations in line with the intent of Policy 5 of the NPS-UD."

22 Policy 5 NPS UD requires district plans applying to tier 2 and 3 urban environments to enable heights and density of urban form commensurate with the greater of

(a) The Level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or

(b) Relative demand for housing and business use in that location

23 In this regard, I concur with paragraph 4.2 of Mr Wallace's evidence where he states that Policy 5 of the NPS-UD does not require the Council to increase density or height in a uniform way just because an area is serviced by public transport.

24 I discuss below how, through the Council's own analysis and my own review of the subject land how the area around the Peregrine Place and Sunset & Star Lane falls within the lowest level of accessibility and relative demand and combined with the high levels of long term growth capacity for attached dwellings that the there is no justification for the upzoning of the land from Lower Density Suburban Residential to Medium Density Residential.

Accessibility & Demand Analysis

Accessibility

25 A key justification for the Council's application of upzoning in response to the NPS-UD is the extensive Accessibility and Demand Analysis undertaken, which is explained in detail in the s32 Evaluation Report - Appendix 3 Memorandum: Method Statement – Accessibility & Demand Analysis – NPS UD Policy 5. This analysis looked at a range of weighted factors including, walkability to a number of destinations including town centres, schools, parks, medical services, employment, supermarkets and existing and planned public transport. Appendix 3, section 7.0 of the s32 Evaluation Report provides a summary map [Figure 16 - Total Accessibility (Weighted)], which identifies the subject land as having the lowest accessibility rating.

I have marked up an enlarged version of the Figure 16 plan highlighting the location of the subject land. (Refer to Appendix 1 of my evidence).

26 Furthermore, as part of the UIV notification documents – titled "Urban Intensification – Story Map"[3] there are a series of interactive maps including accessibility and relative demand maps. These maps allow an accurate zoomed in view of different locations and appear to be the same as the less legible s32 appendix maps for accessibility and relative demand. Figure 3 below is taken from the Overall Accessibility Map from the Urban Intensification Story Map. I have added key roads of interest and the locality of the subject area.

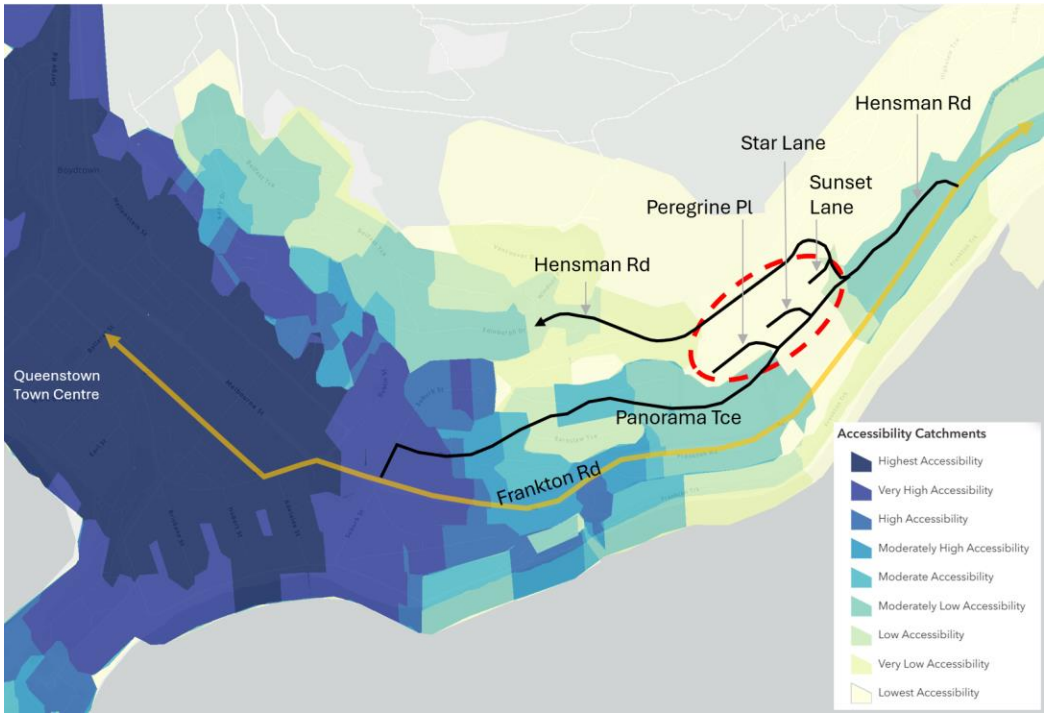

Figure 3 Overall Accessibility Map (Base Map sourced from QLDC Story Map)

27 It is clear in Figure 3 above that the Council's own accessibility mapping analysis identifies the land in the vicinity of Hensman Road, Star and Sunset Lane and Peregrine Place as having the lowest accessibility ranking. Mr Wallace in 4.3 of his s42a evidence identifies and lists a range of physical proximity factors that were considered in determining the accessibility analysis. In Appendix 2 - Accessibility & Physical Proximity of my evidence, I have included the list from Mr Wallace's evidence and added further comments with respect to the accessibility and physical proximity of the subject land area to wider points of interest. The detailed breakdown

[3] https://storymaps.arcgis.com/collections/ba8f492cceb74e2f812a79455fddc48c)

of walking times are based on well accepted practice of 5 minutes to walk 400m and 10 minutes to walk 800m which translates to 1.3m per second on flat ground[4]. Further discussion of the accuracy of these walking times to reflect local context of steep gradient challenges are discussed in paragraph's 33-37. Appendix 3 of my evidence also contains a map depicting many of the points of interest for reference.

28 It is clear from Appendix 2 and 3 in my evidence that the subject area is well outside the walkable catchment to key destinations. I have discussed access to public transport in paragraph 36, which demonstrates that access is constrained by distance and gradients.

29 Ms Morgan also addresses the rationale for the application of the MDRZ in her evidence (paragraph 4.7(a)(ii) where she notes the approach is to "extend the MDRZ within a moderate walking distance of the Queenstown Town Centre and Frankton and taking into account the level of relative demand in Queenstown." What constitutes 'moderate walking distance' does not appear to be specifically defined with respect of the Queenstown town centre. It is noted however that in 4.7(b)(i) of her evidence that being within 1200m or a 15 minute walk of the Wanaka Town Centre is considered to be a moderate walking distance. In terms of the Queenstown Town Centre, it is at least 2km to the town centre which would equate to a 25 minute walk at the well accepted walking pace of 5 minutes per 400 metres. As discussed in my evidence below (paragraphs 32-37) walking up hills steeper than 10% can slow speeds by at least 15%, which could add further times to the walking times outlined in my Appendix 2 – Accessibility and Physical Proximity analysis.

30 The s32 Method Statement Memorandum on Accessibility & Demand Analysis does discuss in part 5.4.1 Commercial Centres that walking catchments of up to 20-minute walking time from the Queenstown Town Centre zone were identified. One can only assume that this constitutes a moderate walking distance in the case of Queenstown. It also noted that Figure 5 (page 12) of this s32 Memorandum identifies that the Centres Catchment Assessment identified the subject land as being in the lower accessibility category. I do acknowledge that a larger catchment was considered appropriate from the Queenstown Town Centre due to the concentration, scale and range of commercial and community activities available. However, it is clear from the analysis in my Appendix 2 and the map in Appendix 3 of my evidence that the subject land is at least a 25 minute walk to the corner of Stanley Street and Ballarat St. This

[4] Munro – The Problem of Catchment in Centres-based Residential Growth Planning

location forms the northern edge of the town centre and the waterfront at the bottom of Ballarat Street would add a further 300m (or 4 minute walk).

31 My analysis demonstrates that the subject land is not within a 20 minute walk, let alone the elusive 5min walk to any of the proximity matters listed in Appendix 2. A key factor that has not been considered in my assessment in Appendix 2 is the gradient factor that is dismissed in the Councils s32 Memorandum in a summarised comment "The effect of the slopes steeper gradients in decreasing the potential distance a user might walk was ultimately, in our opinion low."[5] Further discussion on gradient factors with respect to the subject land is warranted and, in my opinion is critical to determining the true accessibility of the subject land and, in turn, its suitability for MDRZ.

32 The following Table 1 analyses the slopes that are encountered on a walk from the Queenstown Town Centre (Stanley St/Ballarat corner) to Peregrine Place in order to obtain an understanding of the gradients experienced on this 2km walk.

Table 1 Walking Gradient from Queenstown Town Centre to 15 Peregrine Place

	Location	**Gradient**
	Stanley Street/Beetham corner to 25 Stanley St (distance of 131m, 17m vertical)	13% (steepest part 15%)
	Suburb Street/Frankton Rd to Panorama Tce corner (distance of 63m, 11m vertical)	17.5%
	Suburb St/Panorama Tce Corner to 32 Panorama St (distance 75m, 9m vertical)	12%
	Peregrine Place / Panorama corner to 15 Peregrine Place (distance 127m, 15m rise)	11.8%
	Total steep uphill walk to 15 Peregrine Pl • Total metres of gradient over 11% (396m) • 19.8 Percentage of the total walk is steeper than 11% gradient -	

[5] s32 Evaluation Report - Appendix 3 Memorandum: Method Statement – Accessibility & Demand Analysis – NPS UD Policy 5. (page 10)

33 Based on using 15 Peregrine Place as the destination there is a circa 100m vertical rise between the Queenstown town centre lakefront and the subject land, which arguably spread over a 2km plus walking distance does not, on the face of it, sound like a major barrier to walking. There are, however, a number of steep segments that are highlighted in Table 1 above that combined with the 2km distance from the town centre contribute a very real barrier to walking, especially for those of less than average fitness, the elderly, young children, those pushing prams, and people with mobility limitations. Approximately 400m of the walk from the town centre would be on gradients over 11%, which would contribute to increasing walking times by at least 15%[6] and which would translate into an additional walking time of 1 - 2 minutes.

34 These steep sections can also be a treacherous hazard in winter on frosty or snowy days, which make walking dangerous if not impassable. Based on NIWA data, the number of frosty days in Queenstown is not insignificant, with 116 mean annual frost days recorded in the period 1991-2020 (https://figure.nz/chart/Hra3vx0XfcsJEf5H). A Swedish study, Berggård and Johansson (2010)[7] found the risk of single-pedestrian injuries to be almost three times higher when walking on snow and ice than on snow- and ice-free ground when the pedestrians did not use any anti-slip device.

35 In addition, the walk to the bus stops on Frankton Road includes a long steep hill of circa 14.4% gradient for a length of 325m from the corner of Hensman Road/ Frankton Road to the corner of Hensman Road/Panorama Terrace. This is considered a very steep road and would lead to slower travel time particularly for uphill travel. Results from (Ladetto, et. al., 2000)[8] show that the pedestrians did not modify significantly their walking speed in downhill walking as compared to level walking, but slowed down by 15.3% on very steep uphill sections of the circuit (>+10%). Tobler's hiking function[9] suggests that on steep uphill gradients of 15% that walking times are less than half of the speed on flat gradients.

36 The walking times to the nearest bus stops on Frankton Road vary between west bound and eastbound bus services due to the stops being off set from each other by circa 125m. In Table 2 below, I have summarised walking times to and from the bus

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[6] Munro – The Problem of Catchment in Centres-based Residential Growth Planning
[7] Berggård, G., and C. Johansson. 2010. "Pedestrians in Wintertime – Effects of Using Anti-Slip Devices." Accident Analysis & Prevention 42 (4): Pages 1199–1204.
[8] Ladetto, et. Al. Human Walking Analysis Assisted by DGPS, research paper, Geodetic Laboratory, Swiss Federal Institute of Technology, Lausanne, Switzerland.
[9] File:Tobler's hiking function.svg - Wikimedia Commons

stops near Frankton Road/Hensman Rd, including allowing for slower return walking times up the steep Hensman Rd.

Table 2 Walking Distance and Times to Nearest Frankton Road Bus stops

	West Bound Stop			East Bound Stop		
	Distance (m)	Downhill walk time (minutes)	Uphill walk time (minutes)	Distance (m)	Downhill walk time (minutes)	Uphill walk time
Sunset Lane	475m	6	8	600m	8	10
Star Lane	600m	8	10	725m	9	12
Peregrine Pl	725m	9	12	850m	11	14

Assumptions: Downhill speed of 1.3m/second; Uphill speed of 1.0m/second (20% slower)

37 Walking times from Star Lane & Peregrine Place vary from 8-14 minutes while Sunset Lane is slightly closer with walking times of 6-10 minutes. Walking times to bus stops is one measure of accessibility and adding in waiting times for the bus, and bus travel time adds significantly to overall travel times. Furthermore the 14.4% gradient up Hensman Road would be a major barrier (notwithstanding frost/ice factors) to a substantial portion of the population thereby reducing overall accessibility by walking and public transport options. This low public transport accessibility is also confirmed in Mr Wallace's s32, appendix 3 (section 5.4.7) and paragraph 15.10 of Mr Mt Wallace's s42a evidence, where he has mapped the accessibility by bus around Queenstown Town Centre and Frankton. I have enlarged a portion of his Figure 5 (from s42a evidence) below (Figure 3) and added in the location of the Peregrine Place, Star and Sunset Lane area in red for reference. In my opinion due to the low accessibility rating, adding additional population into the subject area would not be in keeping with a well-functioning urban environment.

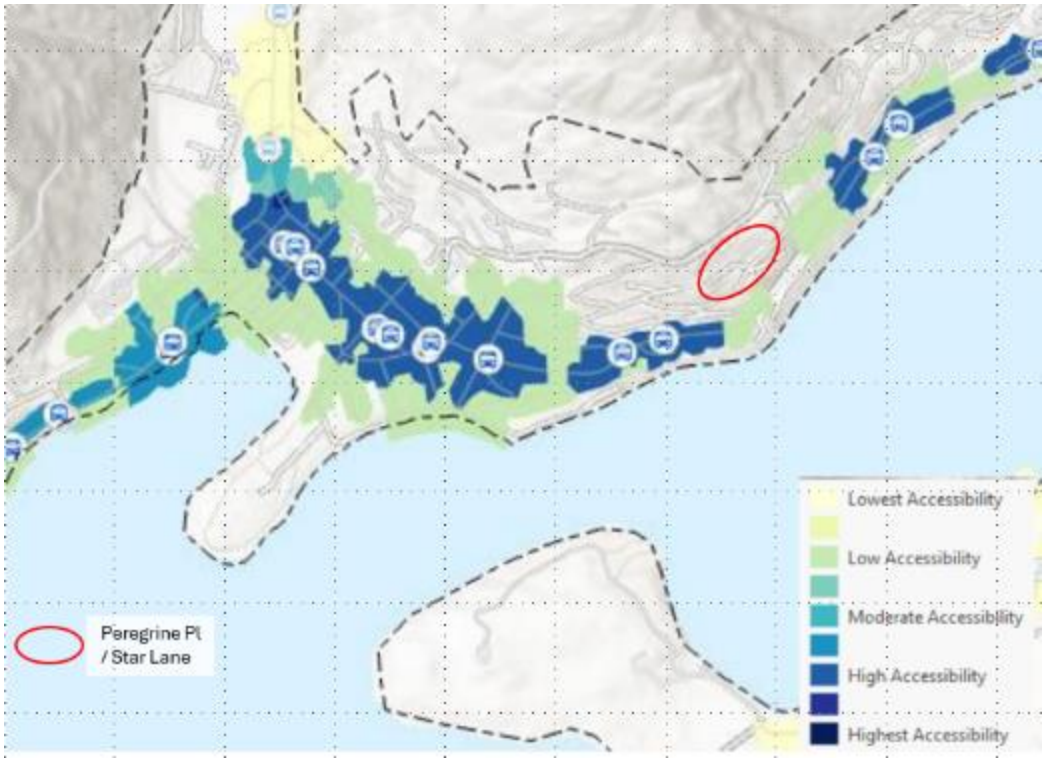


Figure 3: Accessibility by Bus around Queenstown Town Centre and Frankton with darker blue colours highlighting the areas most accessible by buses

Demand Analysis

38 As required by Policy 5 of NPS-UD district plans in Tier 2 urban environments are required to enable heights and densities of urban form having considered both accessibility and relative demand for housing and business in that location. As outlined in their s32 report (appendix 3 Method Statement & Demand Analysis) the Council has undertaken a detailed analysis of relative demand having taken into account a number of factors including, land price and land value to capital value ratios. To help determine relative demand, high land prices and proximity to amenities were considered together using a bivariate analysis. The results of this are summarised in the Council's s32 - Appendix 3, Method Statement & Demand Analysis 'Figure 17 Relative Demand Bivariate Analysis'[10] which identifies most of the subject land as being in a relatively low accessibility and land value location.

[10] Refer page 29 of QLDC's s32 Appendix-3-accesibility-and-demand-analysis-method-statement

39 The UIV online notification document – entitled "Urban Intensification – Story Map" includes a detailed interactive map of the Relative Demand Bivariate Analysis[11] which allows a more accurate zoomed in view of the subject land than that found in the s32 documents. Figure 4 below is taken from the Overall Accessibility Map from the Urban Intensification Story Map. I have marked in red dashed line the area covered by the submissions that are seeking to retain the LDSR. This area is clearly identified as having low relative demand. There are however a small number of sites that front directly onto Panorama Terrace which have medium levels of relative demand (likely due to their closer proximity to Queenstown town centre) as shown in Figure 4 below.

Figure 4 Relative Demand Bivariate Analysis

40 I have looked more closely at these Panorama Terrace sites and given they are slightly more accessible, and have a slightly higher relative demand than the others sites, combined with the substantial height differential between them and the sites behind, they could potentially be justified as being zoned to MDRZ on the basis of accessibility and demand. I note however the effectiveness of this may be limited due to several of these sites having recently been redeveloped.

41 Having reviewed the proposed area to be rezoned to MDRZ it is my view that the subject land requested to be rezoned back to LDSR is outside areas of high accessibility and relative demand and that there is no justification to rezone it as MDRZ. This is particularly so when also considering the large surplus capacity for

[11] (https://storymaps.arcgis.com/collections/ba8f492cceb74e2f812a79455fddc48c?item=4),

attached housing/terrace housing and apartments that have been enabled by the UIV and are discussed further in my evidence below.

Demand and Commercially Feasible Capacity by Attached/Terrace and Apartment Typologies in Urban Queenstown

42 Ms Fairgray has undertaken an initial s32 analysis of the demand and capacity of the PDP before and after the UIV. In her s42a evidence she has updated her assessments to take account of updated population projections provided by QLDC in May 2025. The higher demand projections are approximately 40% higher in the long term than her earlier assessment. In her evidence (para 9.3), Ms Fairgray concludes that the notified UIV substantially increases the level of dwelling capacity from that enabled under the current PDP and goes on to note that the level of capacity is very large in comparison to demand in most locations. I concur with this observation and have used her data to obtain a better understanding of the demand and capacity for terrace housing and apartments for the urban parts of the Whakatipu Ward.

43 In Appendix 1 of her evidence Ms Fairgray has provided further information and analysis and an updated capacity and demand assessment. Paragraph 11 of her Appendix 1 contains a breakdown of a comparison of capacity and demand by dwelling typology and location which are presented in two tables; one relates to a Baseline Scenario (Table E) and one relates to a Higher Market Substitution demand Scenario (Table F).

44 For the Whakatipu Ward this information is broken into a number of 'Catchments' including Arrowtown, Eastern Corridor, Frankton/Quali Rise, Arthurs Point, Queenstown, Kelvin Heights, Southern Corridor and Whakatipu other. There is no map in her evidence indicating the spatial extent of these catchments, although most appear to be self explanatory, it is not clear to me where the subject land fits although I suspect it is likely to fall within the Queenstown Catchment. Notwithstanding this, I have taken the data from her Tables E and F and created my own table (refer Appendix 4 to my evidence) to obtain a better understanding of the demand and capacity for attached/terrace housing and apartments in order to be able to understand how crucial the proposed upzoning of the subject land is to Council meeting its obligations as required by NPS-UD.

45 My assessment (refer Appendix 4 of my evidence) indicates that under the two scenarios, the Whakatipu Ward (excluding Whakatipu other) has a long term dwelling

demand for attached/terrace housing ranging from 5,400-5,700 in the long term, which leaves a surplus capacity of 13,700-14,000. Dwelling demand for apartments in the long term is between 1170-3200, which leaves a surplus capacity of 9,100 to 11,130.

46 Looking at just the Queenstown Catchment my assessment indicates a long term dwelling demand for attached/terrace housing ranging from 1,300-1,700 in the long term, which leaves a surplus capacity of 7,400 -7,800. Dwelling demand for apartments in the long term is between 300-900, which leaves a surplus capacity of 3,800 to 4,400.

47 The substantial surplus capacity for the Whakatipu ward (excluding Whakatipu other) and the Queenstown Catchment align with Ms Fairgray's conclusion that the level of capacity is very large in comparison to demand in most locations. To put the subject land into context the submitters are opposed to approximately 3.0ha of land being upzoned from LDSR to MDRZ.

48 If it is assumed that all the LDSR land is developed to a density of 1/300m^2 average (as enabled by the UIV provisions), that would equate to a total of 100 dwellings. If the area was to retain the MDRZ proposed zoning and be developed at a density of 1/200 that would equate to 150 dwellings or an increase of 100 dwellings compared to the existing LDSR zoning. These numbers assume a vacant canvas and do not account for the approximately 40 dwellings that currently exist in the LDSR proposed to be upzoned, meaning that the true increase in potential dwellings in the subject land is likely to be less.

49 Given the substantial surplus capacity for attached dwellings and apartments across the urban Whakatipu and the Queenstown Catchment it is difficult to justify on demand and feasible capacity why the subject land should be upzoned to MDRZ.

50 On balance given the poor accessibility and relative demand assessment outlined in my evidence, I do not consider that the upzoning of the subject land is appropriate or required in terms of policy 5 of the NPS UD and that the area should remain as LDSR. Retaining the LDSR zoning will ensure that a diverse mix of housing types continue to be provided throughout the district and in particular in the Queenstown Hill/Frankton Arm area (away from the town centre) where the provision for detached dwellings choices is becoming increasingly limited. Retaining the LDSR in this location will contribute to a well-functioning urban environment by providing lower density housing choices in a location that is not suited to intensification due its low accessibility and relative demand.

Alternative Relief

An alternative zone boundary

51 If the Hearings Panel is of a view to not accept the submissions that are seeking the that the LDSR zone be retained over that area marked in Figure 1 of my evidence, then in my opinion the zone boundary should be refined/amended to ensure that the interface between zones is more appropriately managed than under the current UIV proposed zoning which utilises property boundaries. In his s42a evidence Mr Wallace (page 55) is of the view that it is preferrable to utilise natural boundaries such as roads, parks, streams or steep topography as opposed to utilising property boundaries which tend to create issues around recession planes when adjoining lower intensity zones. This approach is also supported by Ms Morgan in her s42a evidence (paragraph 7.6). I concur with this approach and suggest that utilising the far boundary of Peregrine Place, Star Lane and Sunset Lane as shown in Figure 5 below is aligned with the evidence of Mr Wallace and Ms Morgan and will result in a more nuanced zoning boundary and provide greater separation between development in different zones.

Figure 5 Alternative Zone Boundary – Area to be retained as LDSR (Shaded in in red)

52 Notwithstanding that, in my opinion, retaining LDSR over all the subject land would have a negligible effect on the council's adherence with policy 5 of the NPS UD, there is an even lesser effect on the feasible capacity enabled under the zoning scenario depicted in Figure 5 (Alternative Zone Boundary) above. The amendment to the zoning boundary as suggested in Figure 5 above would result in approximately 1.3ha hectares being removed from the proposed MDRZ, which would result in a negligible loss of potential capacity in a location that has low accessibility and relative demand

Alternative Bulk and Location Provisions

53 Should the Hearing Panel not agree to the substantive submissions to retain the LDSR to the subject land (Figure 1) or the alternative zone boundary suggested in Figure 5 above, then I support a more nuanced approach to how the bulk and location standards apply at the interface along the LDSR and MDRZ boundary, in order to address the interface and effects on amenity values of the submitters' land. Where zone boundaries interface with each that have different bulk and location standards e.g. different height limits, boundary setbacks and recession planes, it is common practice for the lesser standards of the adjoining zone to apply to the interface with the higher intensity zone. In this case that would result in the area identified in red on Figure 5 as being subject to the boundary set back, height and recession planes that apply to the LDSR

54 Ideally if submissions permit, this interface principle should apply to all zone boundary interfaces that directly adjoin each other where they are not separated by features such as roads or private lanes

Overall conclusion regarding the proposal

55 Based on my evidence, I have concluded that the application of the Medium Density Residential Zone (MDRZ) to the subject land is inappropriate and should be retained as Lower Density Suburban Residential (LDSR) as outlined in the submissions and discussed in my evidence. In particular, I concur with the Council's own evidence that the subject land is poorly located in terms of accessibility and that the area also scores 'low' in Council's Relative Demand Bivariate Analysis

56 Furthermore, the UIV has enabled a substantial increase and surplus of dwelling capacity to meet demand across the District, Whakatipu and Queenstown catchment in the long term. The potential loss of a small number (circa 100) of future attached

dwellings/apartments enabled by the proposed MDRZ on the subject land is minimal in the wider context.

57 There will be an unnecessary loss of amenity for the submitters properties, namely outlook and privacy, due to the effect of high buildings being enabled on the adjoining MDRZ.

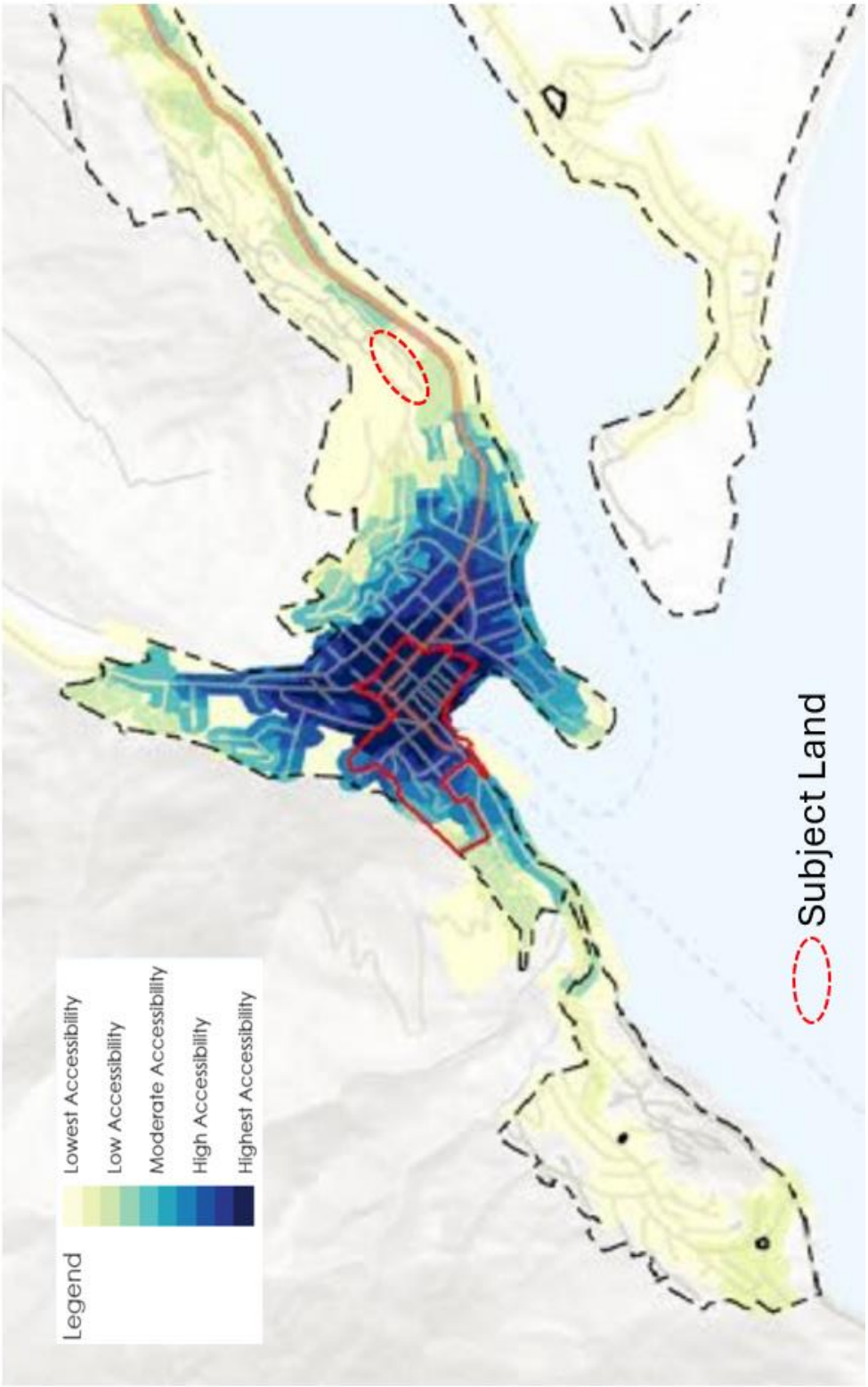
58 It is important to retain diversity of living and housing choices that contribute to well-functioning urban environments, which enable a variety of homes, including detached lower density enabled in the LDSR.

Bruce Harland

4 July 2025

APPENDICES

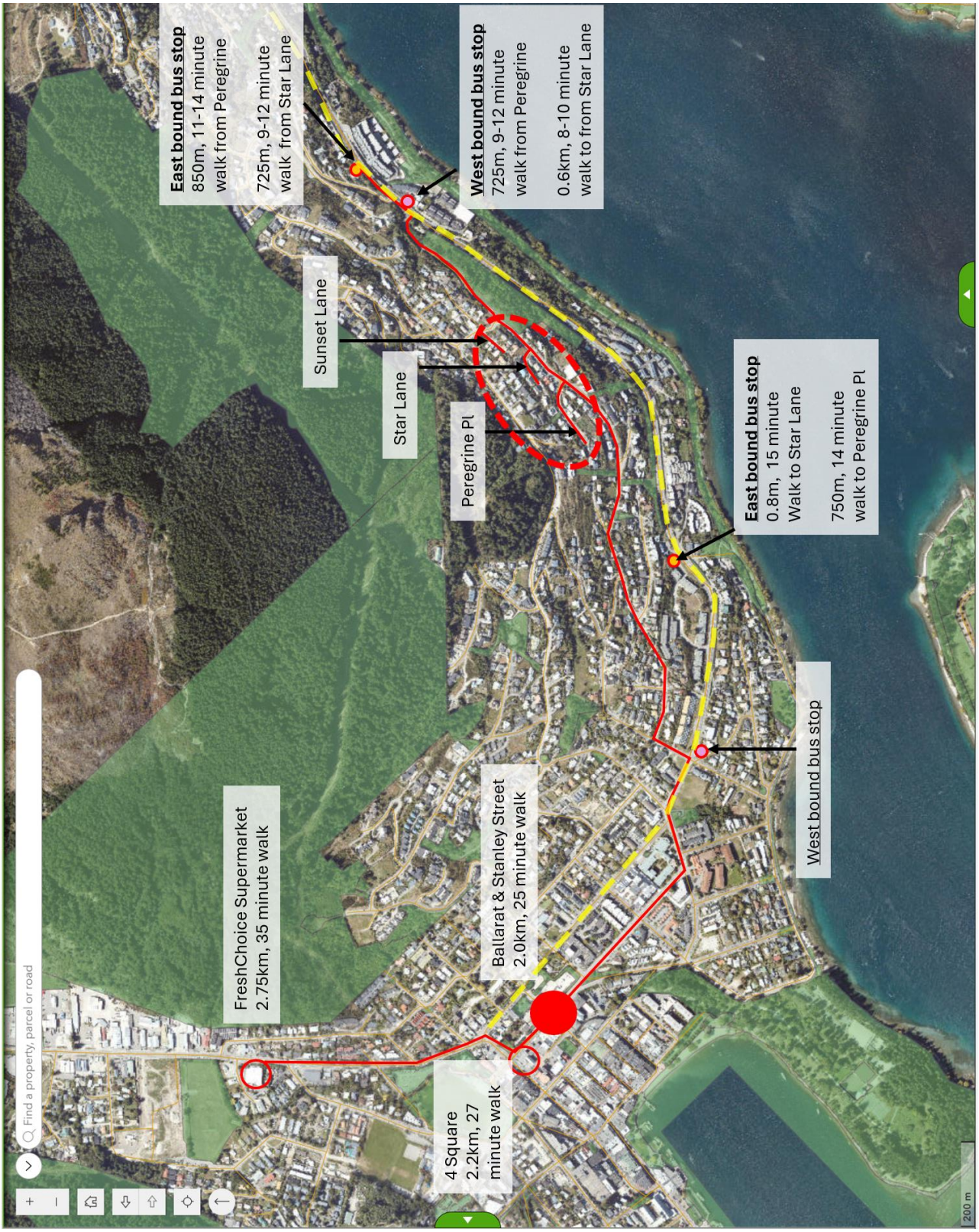
Appendix 1: Excerpt from s32 Evaluation Report - Appendix 3 Memorandum: Method Statement – Accessibility & Demand Analysis – NPS UD Policy 5 (Base Map is from Figure 16 – Total Accessibility (Weighted)



Appendix 2 Accessibility & Physical Proximity

		Analysis / comment
a.	Town Centre Zones	• **2km (25min walk)** to Stanley St/Ballarat St)
b.	Local Shopping Centre Zones	• **2km (25min walk)** to Stanley St/Ballarat St)
c.	Employment Nodes (derived from 2018 Census data)	• **2km (25min walk)** The Queenstown town centre is the nearest employment node.
d.	Shopping Malls	• **2km (25min walk)** to the Queenstown town centre • **6km** - The Frankton /five mile area.
e.	Primary, intermediate, and secondary schools	• **1.7km (22min walk)** to St Josephs School (Primary). This school is planned to be closed and moved to Ladies Mile where a new site has been purchased. • **2.4km (31min walk)** to Queenstown Primary School • **6.5km** Whakatipu High School
f.	Tertiary education providers	• **1.75km (23min walk)** - Queenstown Resort College – • **6km** - Southern Institute of Technology
g.	Early childhood education centres	• **2km** ACG Queenstown early Learning • **2.4km** Kidsfirst Kindergarten – 2.4km Not realistic to walk this far with Toddlers
h.	Full service supermarkets	**2.75km (35min walk)** - FreshChoice - Gorge Rd, minute walk **2.2km (28min walk)** - 4 Square, Shotover St
i.	Major open spaces eg sports fields and general recreational open spaces	**1.7km (22min walk)** - Queenstown Gardens **2.3km (29min walk) -** Queenstown Recreation Reserve
j.	Community and religious facilities	**1.7km (22min walk)** - St Josephs Church **1.9km (24min)** St Peters **2.3km (29min walk)** Queenstown memorial centre
k.	Medical centres, pharmacies and Lakes District Hospital	There are 3 pharmacies in the town centre which are at least a **2.2km (28 min walk)** Lakes District Hospital is approximately **6.2km** away
L	Public Transport services (bus)	**600-850m (8-14 minute walk)** to Frankton Rd eastbound service **475-725m (6-12 minute walk)** to Frankton Rd west bound service
m.	Segregated cycle routes	Frankton trail runs along the lake edge but the nearest accessible point is through private land at 377 Frankton Rd (The Rees Hotel), which adds circa 600m distance from Hensman Road/Frankton corner. Frankton Road has an on-road painted cycle lane heading eastbound only.

Appendix 3 Map of Accessibility & Proximity



Appendix 4

Comparison of Demand and Commercially Feasible Capacity by Dwelling Typology and Location For Urban Catchments of the Whaktipu Ward the Medium (2031) and Long term (2051)

ATTACHED/TERRACE - BASELINE - Medium Term 2031

Attached/Terrace	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	100	1200	1100
Eastern Corridor	200	1100	900
Frankton/Quail Rise	300	2300	2000
Arthurs Point	100	200	100
Queenstown	400	8600	8200
Kelvin Heights	20	600	580
Southern Corridor	100	2500	2400
Total	**1220**	**16500**	**15280**

ATTACHED/TERRACE - BASELINE - Long Term 2051

Attached/Terrace	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	300	1300	1000
Eastern Corridor	900	1500	600
Frankton/Quail Rise	1300	2600	1300
Arthurs Point	300	200	-100
Queenstown	1700	9100	7400
Kelvin Heights	200	600	400
Southern Corridor	1000	4100	3100
Total	**5700**	**19400**	**13700**

APARTMENTS - BASELINE - Medium Term 2031

Apartments	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	30	0	-30
Eastern Corridor	60	600	540
Frankton/Quail Rise	60	3000	2940
Arthurs Point	20	0	-20
Queenstown	100	3600	3500
Kelvin Heights	10	0	-10
Southern Corridor	30	1400	1370
Total	**310**	**8600**	**8290**

APARTMENTS - BASELINE - Long Term 2051

Apartments	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	60	0	-60
Eastern Corridor	200	700	500
Frankton/Quail Rise	300	4500	4200
Arthurs Point	60	0	-60
Queenstown	300	4700	4400
Kelvin Heights	50	100	50
Southern Corridor	200	2300	2100
Total	**1170**	**12300**	**11130**

ATTACHED/TERRACE - HIGHER MARKET SUBSTITUTION DEMAND SCENARIO - Medium Term 2031

Attached/Terrace	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	90	1200	1110
Eastern Corridor	300	1100	800
Frankton/Quail Rise	300	2300	2000
Arthurs Point	100	200	100
Queenstown	400	8600	8200
Kelvin Heights	70	600	530
Southern Corridor	200	2500	2300
Total	**1460**	**16500**	**15040**

ATTACHED/TERRACE - HIGHER MARKET SUBSTITUTION DEMAND - Long Term 2051

Attached/Terrace	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	200	1300	1100
Eastern Corridor	900	1500	600
Frankton/Quail Rise	1300	2600	1300
Arthurs Point	200	200	0
Queenstown	1300	9100	7800
Kelvin Heights	300	600	300
Southern Corridor	1200	4100	2900
Total	**5400**	**19400**	**14000**

APARTMENTS - HIGHER MARKET SUBSTITUTION DEMAND - Medium Term 2031

Apartments	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	50	0	-50
Eastern Corridor	100	600	500
Frankton/Quail Rise	100	3000	2900
Arthurs Point	40	0	-40
Queenstown	200	3600	3400
Kelvin Heights	30	0	-30
Southern Corridor	80	1400	1320
Total	**600**	**8600**	**8000**

APARTMENTS - HIGHER MARKET SUBSTITUTION DEMAND - Long Term 2051

Apartments	Projected Demand	Capacity (Max Profit Allocation)	Capacity Less Demand
Catchment			
Arrowtown	200	0	-200
Eastern Corridor	500	700	200
Frankton/Quail Rise	700	4500	3800
Arthurs Point	100	0	-100
Queenstown	900	4700	3800
Kelvin Heights	200	100	-100
Southern Corridor	600	2300	1700
Total	**3200**	**12300**	**9100**

This data is sourced from Susan Fairgray's s42a evidence, Appendix 1 – Further information on Updated Capacity and Demand Assessment (Tables E and F)