TO: The Hearing Administrator, Lynley Scott, DP.Hearings@qldc.govt.nz

BEFORE AN INDEPENDENT HEARING PANEL APPOINTED BY QUEENSTOWN LAKES DISTRICT COUNCIL

UNDER THE Resource Management Act 1991 ("Act")

IN THE MATTER OF a Variation to the proposed Queenstown Lakes

District Plan (Te Pūtahi Ladies Mile) in accordance with Part 5 of Schedule 1 to the Resource Management Act 1991 ("Variation")

BETWEEN GLENPANEL DEVELOPMENT LIMITED

("GDL")

Submitter

AND QUEENSTOWN LAKES DISTRICT COUNCIL

("QLDC")

Proponent of the Variation

STATEMENT OF EVIDENCE OF BRUCE CHARLES WEIR ON BEHALF OF GDL DATED: 20 OCTOBER 2023

Before a Hearing Panel: David Allen (Chair), & Commissioners Gillian Crowcroft, Hoani Langsbury, Judith Makinson and Ian Munro

Introduction, qualifications and experience

- My full name is Bruce Charles Weir. I am a Director of Saddleback Planning Ltd (Saddleback), and Principal Urban Designer.
- I have been practising as an Urban Designer since 1991. I have been involved in, and led a wide range of urban design and urban planning projects throughout New Zealand, the South Pacific and China. The projects have ranged in both in scale and nature from small urban developments, economic regeneration, masterplanned developments of scale as well strategic land use planning. Almost all projects have involved preparing reports, development guides, and as required, evidence which typically address matters of development rationale and impacts (positive and negative) proposed developments. My project lead role often involves understanding a wide range of competing interests

and ensuring alignment with high-order objectives and policies from inception through to delivery. I have prepared and presented expert evidence at council hearings.

- 3. I hold a Bachelor of Planning degree and a Master of Urban Design (Hons) both from the from the University of Auckland. I am an Associate Member of the New Zealand Planning Institute (NZPI).
- I have also undertaken, and are undertaking, numerous projects within the Queenstown area, and the wider region over the last twenty years. These have included the Bullendale development at Arthurs Point under the Special Housing Act (SHA), The Koko Ridge Development in Ladies Mile, the Flint's Park Masterplan applications as part of this Plan Change (for which I will also present expert evidence) and the Canyon Ridge development at Arthurs Point.
- 5. I am currently involved in Plan Change projects in Cromwell (PC14), Bannockburn (PC19), and Wairatahi (Hastings)m as well as Flint's Park – Ladies Mile. I have advised Glenpanel LP on this site for over 3 years during which time I have made numerous site visits, the last being on the 24th May 2023.
- 6. I am familiar with the site, and surrounding environs.

Code of Conduct

7. I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and confirm that I have complied with it in preparing this evidence. I confirm that the issues addressed in this evidence are within my area of expertise, except where I have indicated that I am relying on others' opinions. I have not omitted material facts known to me that might alter or detract from my evidence.

Scope of evidence

8. The following assessment has been structured upon the principles and coda of the contemporary urban design profession. These have been developed over the last fifty years, from the early works of the likes of

Kevin Lynch and Jane Jacobs, through to the New Urbanism movement which has gained influence in the last two decades.

- 9. While principles of good urban design have varied in title, intent and content over time, they have nevertheless proven robust in shaping quality urban outcomes. In New Zealand, the principles have been disseminated via the "7 Cs" of the Ministry for the Environment's New Zealand Urban Design Protocol¹.
- 10. The 7 Cs of the New Zealand Urban Design Protocol provide the broad scope of matters to be considered in assessing urban design outcomes. Further guidance is taken from the framework of policy documents prepared under the RMA that prescribe the urban design outcomes anticipated in New Zealand's urban environments.
- 11. I have prepared evidence in relation to urban design considerations in support of the submission memorandum of Glenpanel LP (Glenpanel), a submitter on the Te Pūtahi Ladies Mile Variation (the Variation). My evidence includes:
 - (a) Involvement in the Variation and Glenpanel's submission;
 - (b) Strategic guidance underpinning the Te Putahi Ladies Mile Masterplan (the Masterplan);
 - (c) Summary of principal issues;
 - (d) Delivering commercially feasible Medium Density Residential (MDR)
 - (e) The role and potential of Glenpanel's Homestead Precinct;
 - (f) The inclusion of development along, or on, Slope Hill;
 - (g) The Urban Growth Boundary;
 - (h) Matters raised by other Submitters; and
 - (i) My conclusions and recommendations.

https://environment.govt.nz/assets/Publications/Files/urban-design-protocol-colour.pdf

My background involvement in matters relating to the submission and/or Variation

- 12. I have provided urban design and development advice to Glenpanel for this particular site, and have been the lead designer (Masterplanner) throughout. This work has included the preparation of concept plans and yield modelling, preparation of the COVID-19 Fast-track Application, preparation of a resource consent application to the EPA (with associated Deign Manuals) and Stage 1 resource consent application to QLDC.
- My role in relation to Glenpanel's submission on the variation has been to provide advice and assessment in relation to urban design matters. In preparing this statement of evidence I have considered the following documents:
 - (a) The TPLM Variation (and associated documents);
 - (b) The submission memorandum of Glenpanel on the TPLM Variation;
 - (c) The National Policy Statement on Urban Development 2020(NPS-UD);
 - (d) The Queenstown Lakes Spatial Plan, July 2021 (**Spatial Plan**);
 - (e) Section 42A Report on the TPLM Variation prepared by Mr Jeff Brown, dated 29 September 2023;
 - (f) Evidence of Mr Bruce Harland on the TPLM Variation Urban Design, dated 29 September 2023;
 - (g) Evidence of Mr Stuart Dun on the TPLM Variation Urban Design, dated 29 September 2023;
 - (h) Evidence of Mr Michael Lowe on the TPLM Variation Urban Design, dated 28 September 2023;
 - (i) Evidence of Mr Anthony Pickard on the TPLM Variation Transport, dated 29 September 2023.
 - (j) Evidence of Mr Colin Shields on the TPLM Variation Transport, dated 29 September 2023.
 - (k) Evidence of Mrs Jeannie Galavazi on the TPLM Variation Transport, dated 28 September 2023.

Summary of Principal Issues

- 14. My evidence is focused on:
 - (a) The challenges delivery higher density residential housing in Flint's Park.
 - (b) The significance of the Homestead Precinct for Flint's Park and the wider Te Pūtahi ladies Mile Masterplan area (the Masterplan) concessions sought, and;
 - (c) Development along, and in the ONF, and the rationale for concessions sought.

Delivering Higher Residential Density in Flint's Park

- 15. Glenpanel LP sought, and received², Ministerial approval for seeking consent for up to 384 dwellings on the 15.49ha site under the COVID-19 Recovery (Fast-track Consenting) Act 2023. This then became the Infrastructure Design Capacity (P-IDC) for the project.
- 16. Development was effectively constrained to lower part of the site below the ONF delineation, covering 6.07ha (39% of the total site). This comprised of:
 - (a) Medium Density Residential (MDR) zoned land, and;
 - (b) The Homestead Precinct.

Anticipated Medium Density Residential Outcomes

- 17. Glenpanel is generally supportive of the MDR provisions but note the challenges of delivering a relatively high MDR spectrum (40–48dph), and the impact this has on housing typologies, affordability and "well-functioning urban environment's".
- 18. To address this Glenpanel has sought minimum and maximum dwellings thresholds for each superlot (illustrated on Sheet A205) to deliver the densities set in the Masterplan whilst remaining within the P-IDC of 384

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² Referred 27/09/2021

dwellings, and provide flexibility for subsequent build partners to employ their models or adapt to changing market conditions.

- 19. The total number of dwellings provided within MDR-zoned super lots can range from 218–350 dwellings:
 - (a) Below the Collector Road superlots 400–410 = 199 Lots which could deliver up to 328 dwellings⁴.
 - (b) Above the Collector Road Superlots 411 and 412 providing19 lots which could deliver up to 25 dwellings.
- 20. The balance of dwellings within the P-IDC were allocated to a mixed-use quadrant within Homestead Precinct (where no residential density thresholds apply) and a single dwelling (the new homestead) in the rural balance lot.
- 21. If the MDR thresholds were employed verbatim to the zoned land area, the resulting residential density ranges from density of 33–54dph outside the 40–48dph sought in the masterplan.
- 22. Through the consent process, to address and manage this, Glenpanel has proposed the establishment of a Design Review Board (DRB) which would have the ability to ensure development outcomes can be met and enforced (i.e. as a condition of sale of a superlot), prior to detailed design. Although I note that such an approach would be available under future consent applications to manage density, and outcomes, in an appropriate way.
- 23. Where there is a divergence from the proposed Variation, this is based on the feasibility of providing more intensive residential environments and dwellings. It is widely accepted that the more intensive the development, the higher the construction cost⁵ hence why compact freestanding forms are inherently 'affordable-by-design' and multiunit developments require scale to minimise land cost component.

Noting that to reach the minimum 40dph threshold, 234 dwellings are required. This means at least 35 of the 199 will need to contain at least two dwellings to meet the minimum density threshold.

This includes factors such as foundation design, structural design, acoustic and fire engineering requirements, scaffolding, specialist construction teams, logistics, time frames and cost of finance.

- 24. Consequently, delivering 'commercially viable' higher density residential environments (MDR / HDR), even in Queenstown, is challenging. Urban designers and planners acknowledge that in order to attract and sustain demand for more-intensive development requires higher amenity including locational attributes, access to quality public transport, open space and urban services.
- 25. Yet even with these conditions being promoted for the TPLM Area, as Economist Susan Fairgray points out in her evidence⁶:
 - (a) The shift toward more intensive medium to higher density dwellings will be gradual, and;
 - (b) Over the long-term, the growth in dwelling demand is projected to be:
 - (i) Duplex/terraced dwellings: up to 38%
 - (ii) Apartments: 8% to 22%
- 26. Urban Economist, Adam Thompson points out the net lot sizes anticipated in Masterplan yield scenarios based on development efficiencies:

	Development Efficiency	
	60%	65%
MDR	125–150m ²	135–163m²
HDR	83–100m ²	90–108m²

- 27. From this, it is clear that:
 - (a) It would be imprudent to rely on a high uptake of duplex or terraced types (125–150m²) in the short–medium term, and;
 - (b) Any apartment style development needs to be focussed.
- 28. Excluding the Homestead Precinct, Flint's Park delivers a development efficiency of 63% based on a large central green link and quality streetscape outcomes⁷ to support modal shift initiatives. A 'wider-shorter' lot approach⁸ has been employed to enable a broad range of housing

⁶ Paragraphs 12–16.

⁷ Pedestrian amenity and landscaping.

⁸ Minimum 8m wide, minimum 18m deep = 144m²

typologies including family-sized, freestanding dwellings⁹. Affordable house types are predominantly zero-lot or attached typologies, however even then (as detailed previously), at least 35 of the 199 lots in the lower MDR area will require a dual-key / multi-unit solution.

- 29. Increasing the density towards the upper end of the range sought will severely degrade streetscape amenity and functioning, and/or apartment typologies are employed. In response, Glenpanel has sought to support the provision of the of the more intensive typologies where amenity is the highest, around the Glenpanel Homestead and associated grounds, and preserve the integrity of the lower flat area.
- 30. This approach differs markedly from the Masterplan which instead provides for a much larger Glenpanel Precinct which extends to the HDR environment in and around the Town Centre, with low density residential outcomes.

The Significance of the Homestead Precinct in Delivering Higher Densities

- 31. As the graphic attachment illustrates, in addition to the Homestead and grounds, the Homestead Precinct has other attributes which make it attractive for higher density living:
 - (a) Almost equidistance between the two planned Rapid Transit nodes;
 - (b) Located on the Collector Road, where bus services will run and Active Travel is optimised;
 - (c) Is at the head of an NZTA-approved entry road (legibility, wayfinding);
 - (d) Sits at the base of Slope Hill and incorporates one of the 'significant' gully features¹⁰, and;
 - (e) Is elevated above the MDR on the flat, providing for better vistas and outlook.

A Non-Compliant activity under the proposed provisions.

 $^{^{}m 10}$ Identified in PA ONF for Slope Hill, the Masterplan Report and verified by all landscape experts.

- 32. It is also premised on the fact that the Homestead itself could be transformed into a commercial¹¹ or community activity. Likewise, the ground can also accommodate other buildings¹².
- 33. Senior Parks and Reserves Planner at QLDC, Jeannie Galavazi points out in her evidence, there is a shortage community buildings and facilities 13 in the TPLM Variation Area. There is currently "no community facilities other than a shared community hall at the Shotover Country School, which is usually at capacity with school bookings" (para 22) for the anticipated resident population of over 10,000 people (para 13).
- 34. Clearly the Homestead Precinct could play an important part in addressing this.

The Homestead Precinct

- 35. For the reasons outlined above, Glenpanel has sought to:
 - (a) Provide a higher intensity mixed 'use quarter' on the eastern edge Homestead Precinct up to, and on the lower banks of Slope Hill, and;
 - (b) Promote more-intensive MDR outcomes on the blocks¹⁴ immediately west of the Homestead.
- 36. In essence, Glenpanel is proposing consolidating and refocusing the Masterplans Glenpanel Precinct to a more appropriate location which will:
 - (a) Create a highly legible, attractive and vibrant node.
 - (b) Enable the provision of additional MDR or HDR development¹⁵ to the east.

Both outcomes support the provision of more dwellings generally, and the integrity of other masterplan initiatives including the development of a town centre.

¹¹ For which it already has resource consent.

¹² Detailed in the proposed Provisions.

Paragraph 11 – " churches and other community buildings such as memorial halls, sports club rooms and scout dens that are available for the community to use."

¹⁴ Superlots 411 and 412

¹⁵ Over the ex-Glen Panel Precinct land

- 37. A key factor in optimsing the Homestead Precinct concept is the provision of additional building height to 17m (refer page 2 in Graphic Attachment). This not only helps deliver a residential density which is commercially-viable, but it also acts as a landmark in support of the Homestead itself.
- 38. The Masterplan currently interfaces the Glenpanel Precinct (8m height limit) with the HDR (24.5m) environment in the east. This is quite an abrupt transition. By reducing the size and refocussing the Glen Panel / Homestead Precinct, and converting the balance area to MDR¹⁶ (for example), a more desirable transition between zones can be provided.

Development Along and Onto Slope Hill ONF

- 39. Slope Hill is subject to an Outstanding Natural Feature (ONF) overlay¹⁷, the specific features and values of which are identified in the Priority Area Landscape Schedules (PALS). Considerations from the Slope Hill PALS (21.22.6) that stand out from an urban design perspective with regard to the Masterplan are:
 - (a) The visibility and definition of respective faces (aspects) of the 'rouche moutonée' glacial landform is highly valued. The GDL site is located however between the significant feature of smooth -up-glacier' slope to the southwest and steeper slopes to the east adjacent Lake Hayes.
 - (b) The three steep (un-named) stream gullies and remnant native planting associated with these, with new indigenous planting important to reinforcing these features.
 - (c) The irrigation race on the western flanks.
 - (d) The pastural nature of the elevated slopes.
 - (e) Existing built form and associated infrastructure has been carefully located and is subservient to 'natural' landscape patterns.
 - (f) Contextually, there is a strong association between Threepwood Farm and Slope Hill.

^{16 13}m Height Limit.

Not a zone in itself which if often implied.

- (g) Important views and vistas.
- 40. The challenges facing planners and designers with respect to the ONF, and this site in particular, is that:
 - (a) The balance area of 'non urban' development which extends up above the ONF is small and therefore uneconomic for any sort of productive activity;
 - (b) Needs to contain some utilities and amenities which support urban development in the Masterplan (such as water reservoirs), and;
 - (c) If the Homestead is to be optimised as a community hub or node as proposed, will result in effectively a stranded parcel of land.
- 41. To address this, Glenpanel is seeking¹⁸:
 - (a) An extension of the Urban Growth Boundary up above where such water reservoirs might reside so as to provide a planning pathway for consenting that current does not exist;
 - (b) A separate title with allowance for one residential dwelling in the rural balance lot so that in the absence of the land being acquired in the public interest by Council or another public agency;
 - (i) the issue of ownership, maintenance and enhancement of the landscape¹⁹, in whatever form is agreed, can be feasibility achieved, and;
 - (ii) Commercial motivation exists for the land owner to vacate the Homestead and enable such betterment.
 - (c) A limited amount of additional development along the toe of the Hill to help establish a landscaped interface and public pedestrian amenity along Slope Hill along the toe of Hill essentially establishing a 'transition zone' as sought in the Masterplan²⁰.
- 42. Both the PALS and Masterplan articulate that, while three gullies on the southern lower slopes are the 'outstanding features', it is the collective

As illustrated in Graphics Attachments 3–5

¹⁹ In whatever form is ultimately agreed.

²⁰ Refer to

value (physical, associative and perceptual value²¹) of the overall landform and landscape, and particular views to it which are of specific concern. Whether this landscape is to be converted back to a predevelopment (restorative landscape) is also an issue. Although I note that this would result in vegetation obscuring the very feature that is said to be outstanding.

- I will not enter this debate further, except to say the ONF line on District Plan maps:
 - (a) Appears to be quite imprecise, and;
 - (b) There is no consistency as to where it traverses the hillside:
 - (i) Along or close to the water race on the western slopes,
 - (ii) Immediately north of existing dwellings set on varying contours on the lower slopes in the south-western corner and
 - (iii) Generally following the toe of the hill along the remaining southern slopes, in which the Glenpanel site sits).
- 44. Given the significance of the ONF and its immediacy to the Masterplan area, establishing the delineation more accurately and have some sort of principled approach to address the interface between urban and ONF/Rural should have been a priority at the earliest stages of masterplan development.
- 45. However, there appears to be little alignment²² between expert Landscape Architects Tony Milne and David Compton-Moen (for landowners) and Bridget Gilbert (for council) on the appropriate location of the ONF boundary, essentially particularly on the southern face abutting the Masterplan Area.
- 46. Notwithstanding, I will defer to Mr Murray for further detail with respect to the place of the ONF overlays in the planning regime, but note:

²¹ From Summary of Landscape Values (pg 4)

 $^{^{22}}$ Joint Witness Statement of Landscape Experts on 21.22.1 pa ONF Peninsula Hill and 21.22.6 pa ONF Slope Hill – 4 October 2023

- (a) Underlying land uses (zones) generally align, but not always; and
- (b) Likewise for the Urban Growth Boundary.

Therefore it would appear the two can co-exist on different alignments if necessary.

- What is particularly concerning is that the landscape-defensive position taken by Mrs Gilbert has come at the cost of community betterment Slope Hill (and any of its features that are significant) remains private with no public access.
- 48. Being immediately adjacent urban development (TPLM) there is an expectation that the peri-urban hinterland will fulfill some level of supporting role whether than be recreational, tourism or infrastructure related.
- 49. From a planning and legal perspective, development within ONF's is not precluded it simply has far higher sensitivity thresholds to pass. This convention is, however, at odds with the Landscape Capacity assessment provided in the Slope Hill PALS which would indicate that there is essentially extremely limited to no capacity for anything other than farming related activity.
- 50. By incorporating the lower slopes of Slope Hill into the Masterplan area (as well as an extension of the Urban Growth Boundary²³) and enabling a very limited amount of development, this could:
 - (a) Protect and enable the ecological enhancement of the gullies;
 - (b) Secure public access onto, and up Slope Hill;
 - (c) Enable replanting of marginal farm land into native forest and plantings;
 - (d) Accommodate critical infrastructure (such as the Water Reservoirs) to support the Masterplan urban development.

 $^{^{23}}$ As this is necessary to providing for any supporting urban infrastructure such as the Water Reservoirs.

- 51. It should be noted that, in addition to appreciable stormwater improvements resulting from ecological restoration of the gullies, providing strong vertical vegetation lines would also serve to dimmish visual impacts of development on the lower slopes.
- 52. Consequently, seeking to hold a rigid landscape line which does not reflect what is "on the ground", and particularly when it has already been breached elsewhere is, in my opinion, inappropriate and not a sustainable solution to protecting and enhancing an environment for the wider public good²⁴.
- I would therefore recommend that the Commissioners consider the inclusion of a what would be a 'Transition Zone' to the masterplan area, which:
 - (a) Extends from the toe of Slope Hill to the upper water race (which currently defines the upper-most line of the ONF) and incorporates existing dwellings;
 - (b) Is applied as an overlay, and;
 - (c) Enables limited, sensitively designed development, with an appropriate ownership or legal structure which:
 - (i) Ensures public access;
 - (ii) Provides public amenity and;
 - (iii) Enables ecological enhancement.

Considerations for Development at the Toe of Slope Hill with Respect to Views

- 54. The outcomes sought with respect to views and vistas impacting the Masterplan area are best surmised in the Design Principles and Key Moves for the Masterplan, specifically²⁵:
 - (a) Design Principle 1. Consider SH6 as a gateway to Queenstownits role in the arrival experience into Queenstown.

²⁴ This extends to the 'brand' value of Queenstown, and the social and economic well-being of residents.

²⁵ Refer to Graphic Attachments 7 and 8.

- (b) Design Principle 2. Reflect a unique and enduring identity Maintain key views to Lake Hayes, Slope Hill, the Remarkables and surrounding mountains.
- 55. These are further articulated in the Slope Hill PALS as:
 - (a) Eastbound on SH6, west of the Shotover Bridge mid-range views of the 'up ice' flanks of Slope Hill; and
 - (b) Close, mid, and long-range views from Ladies Mile, Lake Hayes Estate and Shotover Country to the south side of Slope Hill the transition from the smooth 'ice up' to rough 'plucked' character.
- 56. With regard to delivering the outcomes sought for the Design Principles, the Masterplan details the desire for 'directed views though to Slope Hill along the Urban Green Corridor'²⁶ but not towards the feature gullies necessarily²⁷.

Anticipated Development Form at the Toe of Slope Hill

- 57. The Masterplan Report has provided clear guidance on anticipated built form outcomes along the majority of Slope Hill, and the rationale for it. These best are illustrated with the building heights (refer GA1) provided for in the provisions and visualization within the Masterplan Report (refer GA8). These illustrate:
 - (a) At 2–3 story construction (circa 8–13m) adjacent to SH6, and;
 - (b) Greater building height towards the ONF:
 - (i) Up to 6 storeys (≤24.5m) east of the Site,
 - (ii) Up to 13m (3 storeys) within and west of the site.
- 58. At the minimum 2 levels required along SH6 (the Green Corridor see GA 10), unless looking down a view shaft (principally roads), views will be elevated towards the upper Slopes of Slope Hill, and obscure or all but obscure any development or the landscape on the lower slopes.

²⁶ Gateway Views – TPLM Masterplan Report.

Refer GA Site Overview of the Illustrative Masterplan. The three gullies identified in the Slope Hill PALS are clearly seen in the ONF area – but the viewshafts provided do not focus on these.

Specimen tree planting along road and open space corridors perpendicular to the highway will result in a similar outcome.

- 59. The obscuring of the lower slopes is also anticipated from the Collector Road due to both foreground and built form outcomes (see GA 11) but perhaps more so as even at 13m (3 storeys) height located close to the road²⁸ the immediate views are likely to be so elevated that the upper ridge lines of Slope Hill will be barely discernible except from open space areas like the Homestead Precinct.
- 60. As the Masterplan Report identifies and illustrates in GA11:²⁹ The Outstanding Natural Feature status of Slope Hill is celebrated for its open space qualities and visual amenity. Higher density living overlooks open space amenity.
- 61. Consequently, the provision of the 17m height limit sought by Glenpanel for a mixed use development on the sites western boundary will essentially give effect to the outcomes sought with limited additional effect outside that anticipated in the Masterplan.
- A fundamental assumption of the Masterplan is that public access will be enabled along the toe of the Hill, but if the landowners are not incentivised (through development as GDL seeks) to 'democratise' this environment³⁰, then the outcomes that the Masterplan seeks, including the support for higher density residential will be undermined.
- 63. To help start establish a wider network of publicly accessible land along the toe of Slope Hill, the Glenpanel Application sought to enable limited development above the ONF.
- 64. Consequently, because of this and the other key reasons outlined above³¹, I can support limited additional development along the edge of which is at or below the height of development in the immediate foreground³².

²⁸ As provided for in the provisions.

²⁹ Design Principle 2: Foster a Unique & Enduring Identity pg 60–61 – Point 6 in Figure 9

³⁰ The homestead, gardens and gully system.

³¹ Specifically poor delineation of the ONF boundary and low anticipated additional visual impact.

³² Being 13m for the MDR and 17m for the Homestead Precinct.

Conclusions and recommendations

- 65. In my professional opinion, whilst the landscape character attributes pay a vital role in helping define Queenstown's natural identity, landscape is never static, and therefore it too must evolve.
- Development, albeit limited, is not prohibited in the ONF. Therefore, all professionals involved in shaping the 'district of the future' need to be looking closely at how community betterment outcomes can be optimised through this limited window of opportunity.
- 67. Extending the UGB higher to enable the provision of critical infrastructure (such as the Water Reservoirs) to support urban development is unavoidable.
- 68. Additionally, the issues of the location of the lower extent of the ONF and the development potential of the lower slopes need to be addressed as part of the masterplan itself.
- 69. Greater flexibility also needs to be enabled in respect of density, and the appropriate mechanisms to achieve it.

DATED this 20th day of October 2023

Bruce Charles Weir

APPENDICES

Attachment One – Graphic Attachment