

**BEFORE THE HEARINGS PANEL
APPOINTED BY THE QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER a submission on the Variation to the
QLDC Proposed District Plan – Urban
intensification

BY **WILLOWRIDGE DEVELOPMENTS,
ORCHARD ROAD HOLDINGS LIMITED
& THREE PARKS PROPERTIES
LIMITED**

Submitter

STATEMENT OF EVIDENCE OF TIM WILLIAMS

Dated: 04 July 2025

Statement of evidence of Tim Williams

Introduction

[1] My name is Tim Williams.

Qualifications and Experience

[2] I hold the Qualifications of Bachelor of Resource Studies from Lincoln University and Master of Urban Development and Design with Distinction from The University of New South Wales. I reside in Queenstown.

[3] I have practised in the planning and urban design field in the Queenstown Lakes District since 2003. I have worked in both local government (QLDC) and private sector roles. Currently I am a director of Williams & Co, a Queenstown based planning and urban design consultancy.

[4] I have 22 years' experience in planning and urban design roles focused on urban development in the Queenstown Lakes District. I have been involved in a wide range of planning and design based matters throughout the district, including policy development, rezoning processes, apartment developments, urban subdivisions and Special Housing Area applications, including the following:

- (a) District Plan Review process including the review of the Three Parks Special Zone and Structure Plan.
- (b) Rezoning in the broader Wanaka area including re-zoning of the land bound by Orchard and Riverbank Roads.
- (c) Resource consents within the Three Parks zone including the Metlifcare Retirement Village development.
- (d) Resource consents including subdivision applications and urban design assessments within the High Density, Medium Density and Lower Density Suburban Residential zones throughout the Queenstown Lakes District.

Code of Conduct

- [5] Although this is a Council hearing, I have read the Environment Court Code of Conduct for expert witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that the opinions expressed in this statement are within my area of expertise except where I state that I have relied on the evidence of other persons. I have not omitted to consider materials or facts known to me that might alter or detract from the opinions I have expressed.

Scope of evidence

- [6] My evidence will address:
- (a) The height limits applicable to High Density Residential Zoning (HDRZ) within Three Parks¹.
 - (b) The extent of Medium Density (MDRZ) and Lower Density Suburban Residential (LDSRZ) Zoning within Three Parks.

High Density Zoning

- [7] I support increasing the height limits applicable to the High Density zoning in Three Parks to 20m as identified in Mr Wallace's evidence. In my opinion the subject land is well placed to accommodate additional height and support the directives of the NPS-UD. In particular I note that the developing nature of the Three Parks area and its greenfield context ensures additional height can be accommodated whilst managing potential amenity effects.
- [8] I note that the s42A report of Ms Frischknecht does not recommend a 20m permitted height limit but instead identifies that such building height is enabled by the restricted discretionary activity status.
- [9] However in my opinion, in a Restricted Discretionary pathway, the applicable matter of discretion (b) where it states '*building dominance and sunlight access relative to neighbouring properties and public spaces including roads*' creates uncertainty to achieving additional

¹ Where reference is made to Three Parks this is the geographical extent of land contained within the Three Parks Structure Plan within Chapter 27 of the Proposed District Plan.

height and is not particularly clear as to the appropriate measurable outcome.

[10] In my opinion recession planes and the high level building setback more directly provide for provision of sunlight access and building dominance of buildings regardless of height. Further in my opinion a Restricted Discretionary activity status is not the same as 'permitted' in an RMA sense. I acknowledge that the NPS-UD does have a particular definition for 'plan enabled', however in my view this is not the same as permitted in the sense of applying the permitted baseline in a consent process. Therefore to best align with the NPS-UD and the direction of the UIV in providing for additional height (and certainty around this direction) a permitted height limit of 20m is supported.

[11] I do not consider the s42A recommendation of Ms Frischknecht to provide an additional Policy for the Three Parks zone in relation to height is necessary. Ms Frischknecht proposes a new Policy 9.2.10.2 specific to Three Parks as follows:

Enable buildings up to 20m heights in the Three Parks Wanaka in situation when:

a. the outcome is of high-amenity design; and

b. the additional height would not result in shading that would adversely impact on adjoining Residential zone and/or public space or does not dominate the streetscape

[12] However in my view, the existing policy framework via Objective 9.2.1 and Objective 9.2.2 along with Rule 9.4.5 ensures appropriate guidance is provided in terms of consideration of neighbouring amenity values and good design outcomes. The Residential Zone Design Guidelines applying in the HDRZ also provide direction as to appropriate design outcomes. This policy direction, and as noted above the other site controls in place in the HDRZ already ensure the potential effects of height are appropriately considered.

[13] I consider that there is no need to specifically identify matters in terms of height in Three Parks separately from elsewhere in the High Density Residential Zone of the District, particularly where Three Parks HDRZ

represents a greenfield area of HDRZ land, and given its proximity to the Three Parks centre is well placed to enable intensification.

[14] Accordingly I would recommend the following changes:

- (a) Proposed Policy 9.2.10.2 is deleted
- (b) Rule 9.5.1.1 is amended as follows:

9.5.1.1 A height of 16.5 metres, including at Frankton North and of 20 metres at Wanaka (Three Parks) except where specified in Rules 9.5.1.2, 9.5.1.3 or 9.5.1.4

Section 32AA Analysis

[15] In my opinion providing for a permitted building height of 20m in the Three Parks High Density zone is more appropriate than the notified provisions because:

- (a) It better recognises that the land in Three Parks is well placed to accommodate additional height without adverse amenity effects.
- (b) It provides greater certainty to encourage uptake of additional height.
- (c) Encouraging additional height provides greater opportunity for increased housing diversity in a location with good access to amenities and therefore supports a well-functioning urban environment.
- (d) Three Parks is ideally placed within the wider Wanaka context to accommodate additional height where otherwise greenfield locations with flat topography and access to a growing range of amenities are limited.

Medium Density Residential Zoning

[16] In my opinion Three Parks is well placed to accommodate additional Medium Density Residential zoning in the eastern part of Three Parks. This area is currently shown to be retained as Low Density Suburban

Residential zoning. I consider that Low Density Suburban Residential zoning does not represent the most efficient use of this land.

- [17] This is particularly relevant within the Wanaka context as the Three Parks land can be developed comprehensively and where there are limited areas of greenfields land of this nature, being flat and having good accessibility to an expanding range of amenities. Furthermore, as this land is situated within a developing urban environment it does not face some of the challenges that can arise when seeking to accommodate up-zoning or additional height within existing urban areas.
- [18] In terms of accessibility I note that generally speaking the UIV has sought to locate HDRZ in areas with highest accessibility and MDRZ has been applied on a more widespread basis². In my opinion this framework supports a slightly broader accessibility test being applied in the sense of 'walkability' than has currently been applied in the evidence of Mr Wallace when considering the extent of potential MDRZ in Three Parks.
- [19] As noted above the Three Parks land is ideally placed to contribute positively to increased intensification and the benefits this provides to a well-functioning urban environment in this part of Wanaka.
- [20] Accordingly, I support the proposed up-zoning of the LDSRZ land north of Sir Tim Wallis Drive as notified.
- [21] In terms of the land east of Sir Tim Wallis Drive I have approached this working back from an appropriate treatment to Riverbank Road when evaluating the potential extent of up-zoning to MDRZ.
- [22] To this extent attached to my evidence **Appendix [1]** is a plan illustrating the extent of MDRZ I support for the land east of Sir Tim Wallis Drive.
- [23] As illustrated in **Appendix [1]** I support retaining a strip (40m wide) of LDSRZ adjacent to Riverbank Road to provide an appropriate edge to the urban extent of Three Parks, and to Wanaka more generally given Riverbank Road represents the current position of the Urban Growth Boundary.

² S42A report (Strategic Evidence) of Amy Bowbyes at [4.8 - 4.9]

- [24] Providing for a row of future LDSRZ lots adjoining Riverbank Road and associated roading within the Three Parks land will ensure an appropriate transition to this boundary whilst ensuring direct access onto Riverbank Road is not required.
- [25] Beyond this interface approach, I support the remainder of the land being zoned MDRZ. I note in this regard that this spatial pattern of MDRZ would increase the extent of zoning from the 150m depth recommended in the evidence of Mr Wallace. However as noted above in my view Three Parks and this area of flat land is ideally suited to support increased densities and provide for a range of housing types where there are limited remaining opportunities in the Wanaka context.
- [26] To provide greater context to this zoning pattern, the plan in Appendix 1 also identifies the existing Structure Plan roading and several additional roads. Road 1 is the alignment of roading agreed with QLDC in the context of the recently re-zoned and soon to be developed Active Sport and Recreation land owned by QLDC. This land will provide a significant area of sports fields and associated amenity to Three Parks and Wanaka more generally.
- [27] Road 2 is the alignment currently being approved as part of the development of the General Industrial zoning in this location.
- [28] In my opinion this roading framework and the significant provision of open space and recreation land in the immediate vicinity provides further context to support additional MDRZ in this location.
- [29] In terms of further roading and open space in my view the existing PDP subdivision chapter and matters of control or discretion alongside the QLDC Subdivision Design Guideline will provide a suitable framework to support the extent of MDRZ without the need for further amendment to the existing Three Parks Structure Plan.
- [30] Given the range of densities and lot sizes enabled through the MDRZ, the extent of zoning as shown (although not exactly matching blocks as described in the evidence of Mr Wallace) can still ensure a logical development pattern given the flexibility in outcomes provided e.g some

may be developed comprehensively and others in more traditional 250m² lot arrangements.

Section 32AA Analysis

[31] In my opinion providing for the extent of Medium Density Residential Zoning as illustrated in **Appendix [1]** of my evidence for the land east of Sir Tim Wallis Drive within Three Parks is more appropriate than the notified provisions because:

- (a) Three Parks is ideally suited to accommodate increased intensification and additional height without adverse amenity effects
- (b) The developing nature of Three Parks means it is well placed to absorb changes in housing types and heights within the wider Wanaka context that has limited opportunities of this nature
- (c) Three Parks will continue to develop amenities and job opportunities to support intensification of housing opportunities and a well-functioning urban environment in this location.
- (d) Increasing the extent of MDRZ in this location will better align with the direction of the RMA, NPS-UD and PDP by providing greater housing intensification in a location where the uptake of this density is more likely given the land is flat, held in a single ownership and does not face the development challenges often faced through infill development.

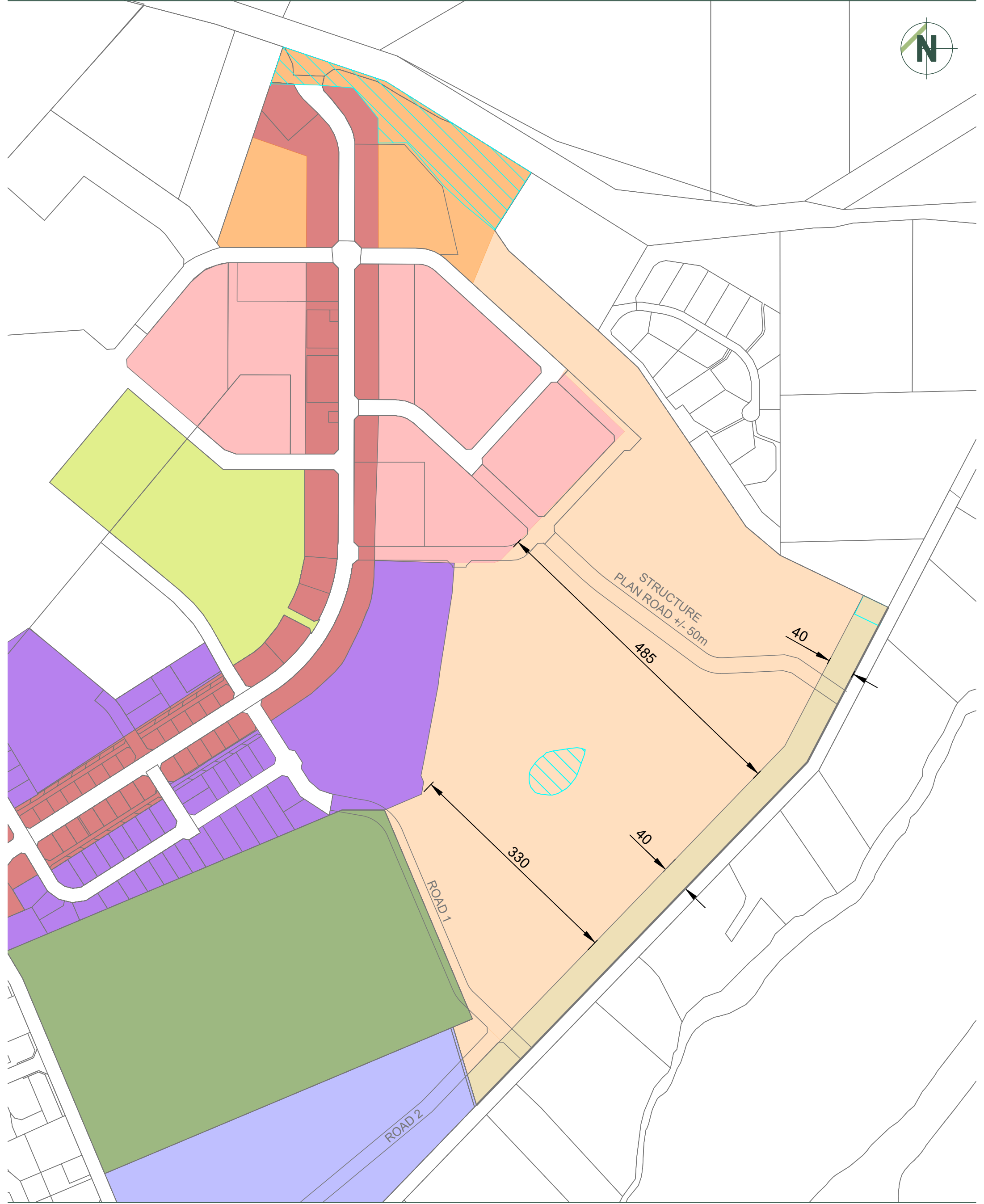
Conclusion

[32] In my opinion providing for additional height in the Three Parks High Density Residential zone and greater certainty to this additional height through a 20m permitted height limit will better align with the UIV.

[33] Providing for the extent of Medium Density Residential zoning as recommended in my evidence (**Appendix [1]**) will provide greater opportunity to support the intensification goals of the UIV than if it were to remain zoned Lower Density Suburban Residential.

Dated: 04 July 2025

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Tim Williams



CLIENT
WILLOWRIDGE DEVELOPMENTS LIMITED
THREE PARKS
WANAKA

DRAWING TITLE
THREE PARKS
URBAN INTENSIFICATION

- NOTES
- Community Purposes
 - Active Sports and Recreation
 - Business Mixed Use
 - General Industrial and Service
 - Three Parks Business
 - High Density Residential
 - Medium Density Residential
 - Lower Density Suburban Residential
 - Three Parks Commercial
 - Building Restriction Area / Public Open Spaces

DATUM INFORMATION
COORDINATE SYSTEM
NZGD2000
LINDIS PEAK
DATUM
ORIGIN OF COORDINATES
ORIGIN OF LEVELS

REV	DRAWN	DATE	NOTE
0	KG	16/06/2025	INITIAL ISSUE
1	KG	18/06/25	UPDATED ZONE AREAS
2	KG	20/06/25	UPDATED ZONE AREAS
STATUS		FOR DISCUSSION	

SURVEYED	-	-
DESIGNED	-	-
DRAWN	OP	13/06/25
REVIEWED	KG	20/06/25
APPROVED	KG	20/06/25
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PROJECT	W3850
DRAWING NO	008
SHEET	100
REVISION	2
SCALE (A3)	1 : 5000