

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

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of the Te Pūtahi Ladies Mile Plan Variation in accordance  
with section 80B and 80C, and Part 5 of Schedule 1 of the  
Resource Management Act 1991.

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**STATEMENT OF EVIDENCE OF STUART JAMES DUN  
29 September 2023**

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## Introduction

- 1 My name is Stuart James Dun.
- 2 I am a Landscape Architect and Principal at Studio Pacific Architecture (**Studio Pacific**). I have been with Studio Pacific since 2013 and in this position since 2019. I am responsible for leading landscape and urban design work for Studio Pacific.
- 3 I have been asked to provide evidence by Queenstown Lakes District Council (**QLDC** or **Council**).
- 4 I have been involved with the Te Pūtahi Ladies Mile Masterplan (**TPLM Masterplan**) since August 2020 when the Ladies Mile Consortium, of which Studio Pacific is a part, began work on the masterplan and subsequently the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**).
- 5 As landscape lead for the Ladies Mile Consortium I have been involved in the development of the overall structure plan, urban design and landscape aspects of the TPLM Variation, coordinating with Candor3, Brown and Co, and other specialist consultants. I was involved in numerous engagement sessions with stakeholders, landowners, and the community. I have been involved in the production of the TPLM Masterplan and the TPLM Variation documents.

## Qualifications and Experience

- 6 My qualifications include a Bachelor of Landscape Architecture (honours) from Lincoln University, 1997. I am a registered NZILA Landscape Architect.
- 7 I have worked as a Landscape Architect on a wide range of masterplanning, urban design, and landscape architecture projects for 23 years in New Zealand and in the UK.
- 8 In my work at Studio Pacific I have been involved in a number of large scale masterplanning projects for private plan change proposals, as well as significant masterplanning and regeneration projects for Government agencies including Tamaki Redevelopment Company and Kāinga Ora (KO). I have been involved in the design and delivery of comprehensive housing developments in Auckland. For example, for masterplanning

and urban design, I have been involved in the following projects to name a few:

- (a) Sunfield Masterplan, Auckland: A masterplan for a 200 hectare mixed use greenfield site with a strong emphasis on car reduced urbanism and walkability;
- (b) Wesley Framework Plan, Auckland: Large scale mixed use regeneration plan to deliver significant housing growth and improved amenity;
- (c) Tāmaki Regeneration Masterplan, Auckland: Comprehensive brownfields masterplan to deliver 7,500 new homes and regenerate three Auckland suburbs;
- (d) Ormiston Town Centre Masterplan, Auckland: Masterplan for mixed use new town centre including medium density housing, retail, and cultural amenity;
- (e) Launch Bay Masterplan, Hobsonville, Auckland: Masterplan for high density neighbourhood including apartment typologies, heritage housing and significant open space;
- (f) Wellington Outer Suburb Growth Strategy, Wellington: Assessment of growth capacity of Wellington's outer suburbs to inform district plan review.

### **Code of Conduct**

- 9 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**

- 10 My evidence addresses the following:
- (a) Development of the TPLM Structure Plan;
  - (b) Key urban design outcomes intended by the TPLM Structure Plan;

- (c) Elements of the TPLM Structure Plan to achieve the outcomes sought; and
- (d) Response to submissions.

### **Executive Summary**

- 11 As a significant area of flat land in relative proximity to central Queenstown Ladies Mile represents a limited resource that must be used efficiently and wisely. By undertaking a comprehensive masterplan design process for the area the resulting TPLM Structure Plan and Variation is intended to achieve a number of outcomes sought by QLDC, and provide for a well-functioning urban environment that integrates transport and landuse solutions to create liveable and connected communities.
- 12 The proposed TPLM Variation is a considered response to a complex range of opportunities and constraints that seeks to urbanise a highly visible rural environment. It is my opinion that the Variation does this in a way which responds to the unique attributes of the site and promotes a strong sense of place. The Structure Plan maintains important views to the surrounding mountains and establishes a consistent corridor for SH6 that reflects the 'gateway' aspect of the approach to Queenstown from the east.
- 13 The Variation provides for consolidated growth with a long term approach to density which promotes efficient landuse and will not enable a proliferation of more single lot, car orientated stand-alone housing. Doing density well will create walkable neighbourhoods and provide a critical population mass that will support public transport and social infrastructure. The location of a commercial centre, high density residential, and medium density residential zones with minimum densities have been carefully considered in relation to proximity to public transport, amenity, and surrounding context.
- 14 The Structure Plan has been laid out in a way that prioritises peoples access to a range of everyday needs. The majority of the site is within a 1km walking distance of the centrally located town centre commercial hub and the Structure Plan incorporates a variety of open spaces including two neighbourhood parks, a community park, and a large scale sports hub. A primary road network that incorporates active travel routes

forms a strong framework for development and a legible organising structure.

- 15 It is my opinion that the Structure Plan and Variation will result in an integrated and well-functioning urban environment consisting of well-connected liveable neighbourhoods.

#### **Development of the TPLM Structure Plan**

- 16 The TPLM Structure Plan is included within the TPLM Variation at Rule 49.8. The TPLM Structure Plan comprises of 6 sheets:
- (a) TPLM Zoning Plan;
  - (b) TPLM Structure Plan – General;
  - (c) TPLM Structure Plan – Building Heights; and
  - (d) TPLM Structure Plan – Roading Cross Sections.
- 17 The process of the development of the TPLM Structure Plan (and the TPLM Masterplan that informed this) has been described by Bruce Harland of Candor3 in his evidence. The process is not repeated here, other than to re-iterate that it was a highly contextual and iterative process. Design development of the TPLM Structure Plan included site investigations, consultation with key stakeholders, landowners, and the wider community. I have visited the site and surrounds on a number of occasions throughout the development of the TPLM Structure Plan, and most recently visited on 24<sup>th</sup> of July 2023. The layout of the TPLM Structure Plan has been informed by input from a number of specialists who are presenting evidence on the TPLM Structure Plan and Variation within their respective disciplines.
- 18 The TPLM Structure Plan design process was informed by a number of factors including:
- (a) The vision, goals, ambitions and key outcomes sought by QLDC;
  - (b) Site opportunities and constraints. These were explored through site visits and investigations by the Ladies Mile Consortium and other discipline specialists as part of the design team including (but not limited to) traffic and transport, ecology, stormwater, civil engineering, and landscape;

- (c) An approach to best practice urban design including reference to the New Zealand Urban Design Protocol 7 C's:
  - (i) Context;
  - (ii) Character;
  - (iii) Choice;
  - (iv) Connections;
  - (v) Creativity;
  - (vi) Custodianship; and
  - (vii) Collaboration.
- (d) A site specific approach to design;
- (e) An iterative design process that responded to specialist reports and input, as well as Iwi, stakeholder, and community engagement and feedback; and
- (f) An approach to sustainable development that seeks to use the land efficiently and create self-sustaining communities.

### **Key urban design outcomes intended for the TPLM Variation**

- 19 The TPLM Structure Plan is a considered design response to a complex range of constraints and opportunities that is intended to:<sup>1</sup>

“...see Ladies Mile developed in a way that improves community outcomes. By integrating transport, community infrastructure, placemaking and design QLDC hopes to make Ladies Mile the most liveable area in Queenstown”.

- 20 Urbanising a highly visible rural environment that sits alongside the arrival route into Queenstown for many visitors is challenging. The development of the TPLM Structure Plan has had to balance a number of competing interests and objectives. This is further complicated at Ladies Mile due to the number of landowners within the TPLM Variation Area.

- 21 As a significant area of flat land in relative proximity to central Queenstown the site represents a limited resource that must be used

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<sup>1</sup> TPLM Masterplan, page 4.

efficiently and wisely. In my experience a holistic and comprehensive approach to the masterplanning of new communities yields far superior results in terms of achieving liveable neighbourhoods and maximising community outcomes. The need to use this resource more efficiently has led to a proposition around density which is described further on in my evidence. The density may be viewed as challenging by some, but in my opinion it leads to the type of walkable neighbourhoods with high levels of amenity that will enable more people to live and work in the area.

- 22 The key urban design outcomes that the TPLM Variation (including the TPLM Structure Plan) is intended to achieve can be grouped under four key headings:
- (a) **Identity and Place:** Promote a strong sense of place and identity and support a healthy environment and ecology.
  - (b) **Housing Provision:** Consolidated growth and more housing, including efficient land use.
  - (c) **Liveability and Wellbeing:** Increased liveability, wellbeing and community cohesion, including well designed neighbourhoods that provide for everyday needs.
  - (d) **Transport:** Enhanced public transport and walking and cycling options including high quality streets.
- 23 All of these outcomes are interconnected and the spatial layout of the TPLM Structure Plan reflects this. They are also reflected in the objectives and policies of the new TPLM Zone provisions.

### **Elements of the TPLM Variation to achieve outcomes sought**

#### *Identity and Place*

- 24 Character and context are critical to creating successful urban environments. The places we live should reflect and celebrate the unique characteristics that make each place distinctive.
- 25 From the outset of the project it was seen as imperative that the masterplan reflected the unique identity of the Queenstown Lakes District, that is a landscape of mountains and natural beauty, and in particular the unique identity of Ladies Mile. A strong sense of place and connection to the natural environment are key considerations in the

spatial configuration of the TPLM Structure Plan. This has been achieved in a number of ways including:

- (a) Curating the arrival sequence from the east along Ladies Mile State Highway 6 as a 'gateway' to Queenstown. This includes maintaining a buffer area before the development and Lake Hayes and ensuring the rural outlook with views from the State Highway to Slope Hill are maintained as when viewed from locations as one travels around the lake;
- (b) Maintaining views to the Remarkables by retaining a set back to the southern side of SH6 and restricting development within the setback;
- (c) Establishing a 25m set back to the north of SH6 as an amenity area with active transport and street trees to complement the existing trees to the south and provide a consistent corridor with a distinct character. The creation of this setback also encourages front doors towards SH6, rather than rear fences;
- (d) Establish and maintain strong visual links to Slope Hill through the development, including the creation of view corridors along collector roads, and in the location of spatial elements such as the community park;
- (e) Varying of height limits across the TPLM Structure Plan to maintain and focus views;
- (f) A vegetation strategy that responds to the local environment, creates a distinctive character, and supports the regeneration of local ecologies; and
- (g) Maintaining heritage features.

26 The proposed urbanisation of the Ladies Mile area to the north of SH6 is a change from its current rural – semi-rural nature. However, by approaching this urbanisation in a considered way, the TPLM Structure Plan establishes a new character for this stretch of land that celebrates and builds upon its key attributes; namely the views to surrounding mountains, views to Slope Hill, the relationship to Lake Hayes, and the existing trees that line the southern side of SH6.



- 27 The sense of place and character within the proposed neighbourhoods is also critical and these aspects are described in more detail under liveability and wellbeing. However, it is important to note that a sense of space and connection to the wider landscape has informed many decisions around the layout of the TPLM Structure Plan and the TPLM Variation policies and rules that support it.
- 28 The TPLM Variation and Structure Plan will not enable a proliferation of more single lot, car orientated, stand-alone housing, but will enable a new way of living at density through an integrated transport and land use approach that responds to the unique landscape of the Queenstown Lakes District.

#### *Housing Provision*

- 29 Queenstown Lakes District is one of the fastest growing areas in the country, facing a number of challenges and constraints to development. As identified in the Queenstown Lakes Spatial Plan (**QSP**), Ladies Mile is one of the four priority development areas.
- 30 Critically, the TPLM Masterplan sets out a long term view and vision. It is recognised that the build out of the TPLM area will take time. The overarching strategy of the TPLM Structure Plan is to provide a robust framework that can be built out over time as demand profiles change. Careful consideration has been given to the ability to stage infrastructure to ensure critical amenity comes on line at key stages as development rolls out.
- 31 The provision of quality housing and efficient use of land have directed an approach to density that seeks to enable comprehensive development and promote an urban lifestyle. Doing density well will provide a critical population mass that will support public transport and the social infrastructure to provide for high levels of liveability and self-sustaining communities. The approach to density is described further on in my evidence.
- 32 The TPLM Structure Plan and Variation provisions promote a comprehensive approach to development with a focus on shared amenity. This approach requires that development is considered at a neighbourhood or 'super lot' scale. This provides the opportunity to design streets and neighbourhoods in more efficient ways. For example, building in a consolidated way with terrace house or apartment

typologies provides the opportunity to 'detach' car parking from individual units and provide consolidated parking. Similarly, a comprehensive approach encourages the development of communal green spaces with higher levels of amenity than can be seen in stand-alone housing models where private garden spaces are becoming smaller and smaller. Comprehensive development also supports better street frontages, which in turn promote safer and more attractive walking and cycling connections.

- 33 The opportunity for the Ladies Mile area is also to support the existing communities of Lake Hayes Estate and Shotover Country which have been developed as low density, car orientated neighbourhoods with little in the way of community infrastructure. The new town centre will create a 'heart' for the wider Ladies Mile area. The provision of recreation, schools, improved transport connections, and potential employment opportunities will benefit the whole of the wider Ladies Mile area.

#### *Liveability and Wellbeing*

- 34 The Urban Design Protocol describes liveable towns and cities as places that "provide a high quality of life where people choose to live and work. They provide attractive living environments, they offer good leisure and recreational opportunities, and they support a thriving cultural life."<sup>2</sup>
- 35 There are a number of elements that contribute to the liveability of a place and the wellbeing of the community. Specifically the following aspects have been embedded in the TPLM Structure Plan to promote high levels of liveability within Ladies Mile, as well as support improved amenity for the existing neighbourhoods of Lake Hayes Estate and Shotover Country:
- (a) **Walkable neighbourhoods and access to everyday needs:**  
Proximity to public transport, open space, schools, and a town centre that provides for a range of everyday needs is critical to the development of walkable neighbourhoods. The majority of the site is within a 1km walking distance of the centrally located town centre commercial hub, which is approximately a 10 -12 minute walking distance.

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<sup>2</sup> New Zealand Urban Design Protocol, published in 2005 by the Ministry for the Environment, at Page 13.

- (b) **Proximity to a variety of open space:** The TPLM Structure Plan incorporates a variety of open spaces that cater for different scale activities. A centrally located community park, two smaller neighbourhood parks at either end of the collector road, and the large scale sports hub on the southern side of SH6.
- (c) **Connection to nature:** Direct and legible connections are provided to existing walking and cycling networks that enable easy access to the wider recreation opportunities associated with Lake Hayes and beyond. Furthermore, the development of the open spaces and streets will bring nature into the community through planting which will be complimented by provisions requiring the planting of trees and permeable landscape surfaces within private lots.
- (d) **Encourage and enable active transport (walking and cycling) and connectivity:** The street typologies proposed provide for active transport and promote walking and cycling as a primary way of getting around.
- (e) **Provisions for outlook and open space:** Outlook and open space provisions recognise the unique environment and are of a more generous standard than similar types of developments (in terms of building typologies) in other parts of the country, for example the Auckland Unitary Plan (AUP). For example; AUP THAB zoning requires outlook for primary living that is 6m deep by 4m wide, and 4m by 4m for MDR zone. Whereas, in TPLM the provisions require the following more generous outlook dimensions for primary living spaces related to building height:
- 1 – 2 storey = 8m deep x 4m wide
  - 3 storey = 10m deep x 4m wide
  - 4 storey and above = 12m wide x 4m wide
- (f) **Schools:** The TPLM Masterplan anticipates two new schools, a primary and a high school. These are not included in the TPLM Variation as discussions are ongoing with the Ministry of Education (**MoE**). However, it is envisaged that these schools would become important centres for the community and reduce children's travel distances to school, which currently accounts for a large number of trip journeys across the Shotover bridge.

- (g) **Sports hub:** 516 Frankton-Ladies Mile Highway zoned Open Space Precinct anticipates a range of playing fields that provides important active recreation opportunities for the communities of Ladies Mile, Lake Hayes Estate, and Shotover Country, as well as the wider Queenstown Lakes District.
- (h) **Safe streets:** Safe streets are key to the success of walkable neighbourhoods, and to the promotion of community cohesion and 'neighbourly' interactions. A clear and legible street network is proposed within the TPLM Structure Plan and the street cross sections have been carefully considered to achieve a safe, legible and functional street network. The approach to comprehensive development reduces vehicle crossings and provides for safe cycleways and walking connections between housing and amenity.

### *Transport*

- 36 One of the key strategies of the TPLM Variation is to work within the existing constraints of traffic congestion and the two lane Shotover bridge which limits the amount of additional vehicle traffic that development within the Ladies Mile area can support.
- 37 The details below provide an overview of the urban design strategies that support the transport objectives of the project, but I refer to the evidence of Mr Shields for a detailed assessment of the transport strategy.
- 38 The successful development of the TPLM Variation area requires a modal shift away from private vehicle journeys to public transport and active transport (walking and cycling). Fundamentally the TPLM Variation is seeking to avoid the transport issues created by the low density, car centric neighbourhoods to the south of SH6. The layout of the TPLM Structure Plan helps to enable this by:
  - (a) Providing many of the day to day needs of the community within the neighbourhood. i.e. removing the need to leave the neighbourhood and travel to other parts of Queenstown for a number of activities.
  - (b) Developing at density to provide a critical mass of population to support frequent and direct public transport (buses).

- (c) Providing easy access to bus stops through a legible and safe street network.
  - (d) Creating clear, safe and legible cycleways that link to the wider Queenstown cycle network.
- 39 By providing genuine alternatives the TPLM Variation creates a community where the use of private car journeys is reduced, whilst recognising that private vehicles will still be required for some activities and by some people. The provisions include restrictions on car parking that will support the mode shift ambitions of the project.

*Density and Height*

- 40 The issue of density is fundamental to the TPLM Variation. To ensure the efficient development of this land in a way that achieves the urban development outcomes, development of a sufficient density is required to achieve a population mass to support the improved infrastructure and amenities proposed, and needed to support vibrant self-sustaining communities.
- 41 The TPLM Variation enables up to 2400 dwelling units in order to achieve this, the TPLM Variation incorporates two *minimum* density precincts:
- (a) Medium Density Residential (**MDR**) Precinct that requires a minimum of 40 residential units / ha; and
  - (b) High Density Residential (**HDR**) Precinct that requires a minimum of 60 residential units / ha.
- 42 In reaching this density, there were a number of factors taken into account. One of the key factors was the effect on the transport network, balanced against the opportunity to enable more housing and generate mode shift.
- 43 The evidence of Mr Shields demonstrates that up to an additional 2400 residential units in the TPLM Variation Area can be supported. At the same time, achieving this density is an essential part of mode shift targets required and discussed in Mr Shields evidence. The TPLM Variation and Structure Plan seek to enable this maximum number of dwelling units to achieve a critical population mass that will support the levels of public transport, social infrastructure, and amenity required to

achieve highly liveable, healthy, and thriving neighbourhoods. The TPLM Structure Plan locates this housing in a way that supports walkable neighbourhoods, i.e. close to the amenity provided, and in a way that celebrates the outstanding natural landscape.

- 44 The evidence of Susan Fairgray evaluates the TPLM Variation enabled residential development opportunity (including density, height, typology, etc) in relation to market feasibility and projected demand within the Queenstown Lakes District. Ms Fairgray's evidence demonstrates that the High Density Residential and Medium Density Residential Precinct minimum densities encourage patterns of dwelling development, most of which are likely to be feasible in the short to medium-term and are already established within the Queenstown market.
- 45 Studio Pacific has also undertaken a number of exercises to test these densities against the TPLM Variation provisions and has concluded that through a comprehensive approach to development these densities are able to be met from a spatial and urban design perspective. If the TPLM Variation Area is developed in a way that is consistent with the Structure Plan and zone provisions, and achieves the minimum densities, it is my opinion that the outcomes the TPLM Variation seeks in terms of housing provision, identity and place, liveability and wellbeing, and connection to public transport will be met. The provisions and rules that underpin the urban outcomes sought are discussed more fully in the evidence of Mr Lowe.
- 46 It is envisaged that the neighbourhoods would be built out over time as infrastructure is developed and demand profiles change. In my experience new developments such as this support higher and higher densities over time. An example of this is in Hobsonville Point where the most recent neighbourhoods exceed the density that was envisaged in the early stages of development. By requiring minimum densities across sub precincts the TPLM Structure Plan safeguards against building out the TPLM Variation area with lower density typologies that might be more attractive to developers today, at the cost of using up land that could support higher density typologies in the future.
- 47 Height is linked to density and provides an overlay to help the buildings sit comfortably within the natural landscape. A strategy has been applied that steps up height towards the base of Slope Hill. Height is increased through the centre of the site to 24.5m maximum within the HDR zone.

This supports an increase in density close to the commercial centre and other key amenity. Height is restricted to 13m max along SH6 and within the MDR zones to provide a gradation of height from the accessible public edges in towards the base of Slope Hill. A two storey minimum overlay is applied to the edge of SH6 to promote an urban edge.

### **Spatial layout of the TPLM Structure Plan – Bringing it all together**

- 48 The overall spatial layout of the TPLM Structure Plan enables the outcomes sought and described above by providing a framework for development that considers the whole of Ladies Mile. The key features of the plan are described in detail in the Masterplan Report, and I have summarised the key features of the TPLM Structure Plan below:
- (a) Treatment of SH6 as a 'gateway corridor' with frequent public transport on dedicated bus lanes, open views to the south and a green filtered urban edge to the north.
  - (b) Access into the development area via two new proposed roundabouts (as well as exiting Stalker roundabout) with collector roads creating viewshafts to Slope Hill.
  - (c) A primary collector road (collector type A) that runs east west through the development closer to Slope Hill and provides primary vehicle access and active transport links.
  - (d) A new centrally located community park and two neighbourhood parks.
  - (e) A centrally located commercial centre.
  - (f) A significant new sports hub and recreation grounds on the council owned site to the south of SH6.
  - (g) The Structure Plan also anticipates the provision of a new primary and a new secondary school, however these are to be confirmed by MoE.

### **Response to Submissions**

- 49 I have reviewed the submissions that comment on matters relevant to my evidence, and I respond to the key matters raised below under a series of theme headings.

## Integration / Well-functioning

50 A number of submissions have raised concerns that the proposed Structure Plan and Variation will not lead to a well-functioning and integrated community.<sup>3</sup>

*TPLM will not be a well-functioning self-contained community (will still result in trips outside of the structure plan area).*

51 As described in my evidence the TPLM Structure Plan and Variation have been purposefully designed to include the core elements of a well-functioning neighbourhood and provide for as many of the day to day needs of the community as possible. These include:

- (a) Providing for key community amenity such as parks, schools, a commercial centre, and connections to public transport and recreational amenity. The intent of this amenity is to provide for the daily needs of the community, and these components of the masterplan are distributed within easy walking distances from the majority of proposed residential housing.
- (b) Offering a variety of living choices to residents by enabling a range of housing density, typologies, and sizes.
- (c) The requirement for minimum densities to achieve a critical mass of population and support the levels of amenity and infrastructure required to improve outcomes for both the proposed neighbourhoods and the existing low density neighbourhoods adjacent.

52 Naturally residents will still need to, or want to, travel beyond Ladies Mile for certain activities. The intent of the TPLM Structure Plan and Variation is not to eliminate this, but to reduce the number and frequency of these trips, and to provide alternatives to vehicle traffic in the way of improved access to public transport and active transport links.

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<sup>3</sup> Ian Moore (submitter 11); Jennifer James (submitter 25); Louis Martin (submitter 32); Margo Pryde (submitter 60); Nick Winstone (submitter 68); Lake Hayes Estate Shotover Community Association (submitter 79); Ferry Hill Trust (submitter 96); Te Rūnanga o Ngāi Tahu (submitter 100); Martin Barrett (submitter 118).



*TPLM will not complement and integrate with urban development on south side of SH6 (Lake Hayes Estate and Shotover Country).*

- 53 As noted above, it is the intent of the TPLM Structure Plan to provide for a level of amenity to serve both the proposed and the existing neighbourhoods and provide for a number of those things that have not been provided for in these existing lower density communities. These include: Sports hub, commercial centre, and improved transport connections.
- 54 It is my view that the TPLM Structure Plan is complimentary to the existing urban development on the south of SH6 and supports the liveability of these existing neighbourhoods.
- 55 The nature of SH6 will be changed through a reduction in traffic speed and urbanisation on the northern side. This will promote and enable better connectivity between TPLM Variation area and the existing neighbourhoods through proposed at grade crossings over SH6. This will allow existing residents south of SH6 to easily access the commercial centre, potential schools, and other amenity to the north. The proposed sports hub also becomes a critical connector between the existing and proposed neighbourhoods and is part of the wider active transport and recreation network for the area, linking into existing cycling and walking trails and providing improved connectivity between the Shotover River and Lake Hayes.
- 56 Improved public transport facilitated through the proposed bus lanes on SH6 will also provide for enhanced connectivity and transport options for Shotover Country and Lake Hayes Estate and further integrate the proposed and existing communities.

*Seek that land is vested for a new road from variation area to Lake Hayes Estate / Shotover Country (active travel underpass insufficient).*

- 57 The submission by Ferry Hill Trust (submitter 96) proposes a grade separated local road under SH6 to eliminate cross-flowing traffic from entering SH6. I do not believe that providing a grade separated vehicle connection is an appropriate response given the land that would be required to achieve this design and the cost associated with construction of a vehicle underpass. In my opinion it would in fact undermine the mode shift objectives of the project. Connectivity between the existing neighbourhoods and TPLM is provided through active travel (walking

and cycling) connections across SH6 and through a potential underpass (noting that the new roundabout and slower speed proposed for SH6 will further facilitate connectivity).

- 58 Vehicle traffic will be able to travel between TPLM and Lake Hayes Estate and Shotover Country through the proposed Howards Drive roundabout and the existing Stalker roundabout.

*Pedestrian crossing on SH6 will disrupt traffic, need underpass.*

- 59 Jennifer James (submitter 25) seeks a requirement for an underpass at SH6 because a pedestrian crossing will disrupt traffic. Mr Shields evidence will address the traffic implications. However, from an urban design point of view a pedestrian crossing is preferred because it provides a more direct connection for pedestrians and cyclists. Pedestrian underpasses also present CPTED issues to resolve including visibility, lighting, sightlines for users to feel safe.

*Ensure Ladies Mile strategically connects with public transport and multi-modal transport options.*

- 60 The provision of accessible and reliable public transport is fundamental to achieving the mode shift targets of the project and providing transport choices for the community. The integration of the bus network providing bus stops within a 400-500m distance or 5-6 minute walk from the majority of residential housing along a dedicated bus priority lane on SH6 has been carefully considered. Connections to the wider transport network and the wider transport strategy is discussed in detail by Mr Shields in his evidence.
- 61 Similarly, connections into the wider active transport network have been facilitated in order to promote walking and cycling as primary transport options.

*Level of density will have long term issues in terms of social behaviour and minimal control to address this.*

- 62 Martin Barrett (submitter 118) raises concerns related to potential problems with high density living stating that: 'Given that once built, council will have little or no ownership, minimal responsibility for social behaviour, and minimal control, the likelihood for problems developing seems considerable'.

63 It is my view that the density proposed coupled with the considered provisions of the TPLM Variation will in fact lead to positive social and community outcomes. As stated within my evidence the density provides for a level of transport and social amenity that supports well connected neighbourhoods.

### **Carparking spaces**

64 Numerous submissions have raised issues related to carparking provisions.<sup>4</sup>

65 The majority of these submissions are seeking to increase both on site and visitor parking, stating that the proposed provisions are unrealistic and inadequate. Contrary to this Waka Kotahi's submission contends that too much on-site parking will undermine the mode shift objectives of the project.

66 The proposed car parking provisions are:

- (a) On-site: 0.5 parks for 1 bedroom dwelling, 1 park for 2 bedroom dwellings, and 1.5 parking spaces for 3 bedroom dwellings and larger.
- (b) Visitor Parking (on street): Up to a maximum of 1 on street car park per 3 dwellings.

67 It is a difficult balance to restrict car parking in a way that encourages that mode shift away from private vehicles, whilst being realistic around the needs of the community. It is my understanding that QLDC and Waka Kotahi have agreed to the above proposed standards and I support this decision.

68 Alongside parking restrictions a number of travel behaviour change measures will be built into the transport strategy, including strategies for car sharing as well as public transport and active transport initiatives.

69 From an urban design perspective, the car parking ratios are further incentive for developers to consider and apply a comprehensive

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<sup>4</sup> Nicole Fairweather (submitter 21); AA Southern Lakes (submitter 56); Park Ridge Limited (submitter 75); Maree Wheeler (submitter 76); Koko Ridge Limited (Submitter 80); Stephen Brent and Sheena Haywood (submitter 92); Winter Miles Airstream Limited (submitter 94); Waka Kotahi New Zealand Transport Agency (submitter 104); Milstead Trust (submitter 108); Robyn Macleod (submitter 109); Travis Sydney (submitter 110); Gordon Griffin (submitter 114); Martin Barrett (submitter 118).

approach to development. For example, consolidated carparking associated with apartment buildings reduces vehicle crossings on footpaths and results in safer footpaths and streets.

- 70 Ultimately people will have a choice whether or not to live in this development. They will purchase or rent dwellings with the knowledge that car parking is limited but access to public transport and other active transport is superior. This is not a situation where parking is being taken away from existing residents.

### **Opening paper road on Marshall Ave affects Threepwood as a working farm**

- 71 Several submissions oppose the opening of the paper road.<sup>5</sup> This is generally with concern for:

- (a) Health and Safety;
- (b) Compromised farming operation; and
- (c) Degradation of Slopehill as an outstanding Natural Feature (if farming operations were to be ceased).

- 72 It is my understanding that given there is a paper road in place, the public already have a right to pass and re pass over the paper road. Connection to the paper road is proposed in the TPLM Variation to retain access to amenity areas beyond the site, and to provide potential future connections to the wider active transport network. Whilst I acknowledge that, in time, with increased public access farming operations may need to be adapted to mitigate any potential conflicts I believe that this could be managed appropriately without compromising farming operations or public safety.

### **School**

- 73 Numerous submissions, have raised issues relating to the provision of schools within the TPLM Variation.<sup>6</sup> Shane Pratley (submitter 41)

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<sup>5</sup> Threepwood Farm Residents Association and Threepwood Custodians Limited (submitter 33); Amanda Styris (submitter 40); Lloyd and Debbie Anderson (submitter 48); Romain Kuhm (submitter 64); Sarah and Blair O'Donnell (submitter 67); Travis Sydney (submitter 110); Kirsty and Justin Crane (submitter 115); Louise and Philip Keoghan (submitter 120).

<sup>6</sup> Shane Pratley (submitter 41); Rob Burnell (submitter 47); Celine Ausin (submitter 57); Anna McCarthy (submitter 61); Maree Wheeler (submitter 76); Ferry Hill Trust (submitter 96); Waka Kotahi New Zealand Transport Agency (submitter 104).

suggests that the council owned property on the southern side of SH6 is better suited as a school location. From an urban design perspective a school location on the north of SH6 is preferred as it provides better and more immediate connectivity to the proposed higher density neighbourhoods.

- 74 The other submissions raise the issue that although anticipated and enabled through the provisions the Ministry of Education (**MoE**) has not confirmed its commitment to, or the location for the schools. This raises concern about the viability of the TPLM Structure Plan and potential pressure on the school role of the existing Shotover Primary School (Anna McCarthy, submission 61).
- 75 In the MoE submission (submitter 86) they confirm that they are continuing to work with respective stakeholders and Queenstown Lakes District Council to identify and acquire a suitable site/s to enable delivery of educational facilities to the future Te Putahi Ladies Mile community.
- 76 From an urban design perspective the provision of new schools is an important component of achieving the mode shift objectives of the project and creating walkable higher density neighbourhoods. The location of the schools proposed in the masterplan are the preferred locations from an urban design perspective, however the Variation provisions are generally enabling of schools anywhere within the MDR and HDR zones. Ultimately it will be up to the MoE where it locates schools, but I agree that provision for schools in the TPLM Variation area will be positive from an urban design perspective and contribute to a well-functioning urban environment.

### **Collector Road A**

- 77 Submissions by Glenpanel Developments Ltd (submitter 73) and Milstead Trust (submitter 108), oppose the location of Collector Road Type A and request that it be re-aligned with the existing paper road.
- 78 Glenpanel is concerned that identification of the Collector Road is an improper use of the RMA to take land and the Milstead Trust considers the Structure Plan should make use of existing unformed roads.
- 79 The location of Collector Road A has been carefully considered to provide primary east west access through Te Putahi Ladies Mile. The collector road has not been aligned with the existing paper road as this

is closer to Slope Hill and would result in narrower development parcels at the base of Slope Hill. Once the collector road is built there will be an opportunity to close the paper road and for that land to be transferred to adjoining landowners. This would need to be agreed as between Council and the landowners. In my opinion, the proposed Collector Road A location is the most appropriate in terms of achieving a well-functioning urban environment.

- 80 Airways Corporation of New Zealand Limited (submitter 69) has requested a change to the variation to maintain access to land to the north in order to access navigational aid at the top of Slope Hill.
- 81 I agree that maintaining access to the navigational aids at Slope Hill and wording should be incorporated into the TPLM Variation to allow for this. I understand the proposed wording will be included in the s 42A report.

#### **East-West Collector Road**

- 82 Ladies Mile Property Syndicate (submitter 77) and Sanderson Group (submitter 93) have requested that the unformed legal road that runs east west through their respective properties be zoned HDR Precinct and oppose the vesting of the east west link collector road shown in the structure plan. For the reasons I have previously stated, it is my opinion that the east west link collector road is in the most appropriate locations.
- 83 It is my understanding that once the collector road is constructed the existing paper road could be formally closed in the future and would adopt the adjacent land use zoning (HDR) (see Rule 29.3.2.2 of the PDP).

#### **Sylvan Street Link Road**

- 84 Allan Meredith (submitter 22) strongly disagrees with the Sylvan Street link road and suggests it should remain for cycle / pedestrians only. They believe that a link road is not appropriate being located between two existing properties and that the road is too narrow. They propose the use of Howards Drive instead.

The purpose of the proposed link at Sylvan Street is to enable the fully developed public transport route along a dedicated bus way on SH6 to extend to the eastern most point of the structure plan area and capture the full extent of the proposed medium and high density neighbourhoods, and connect with the existing Shotover and Lake

Hayes communities. This ensures public transport is within easy walking distance of all residences to help to achieve the stated mode shift targets of the project. Restricting access into Lake Hayes Estate through the Howards Road roundabout would result in an additional bus loop through the high density neighbourhood increasing travel times for the network and reducing efficiency.

- 85 Potential mitigation for reducing the impact of noise and vehicle lights, such as planting, visual and noise barriers could be explored through detailed design of this route. The gap between properties is approximately 19m wide and thus sufficient to accommodate public transport and active transport modes as well as amenity planting and/or additional screening if required.

### **McDowell Drive**

- 86 David Finlin (submitter 101) notes that they are 'unclear whether the unformed road that extends to the north of the submitters land are proposed to be closed, or used for either road or active transport purposes'.
- 87 No changes are proposed to the unformed paper road to the north of McDowell Drive outside of the Structure Plan extent. The intent is that this remains as an active transport link. Within the Structure Plan extent area this unformed road could be closed and could be developed, however connection to the paper road would be required to be maintained through Local Road Type E. The Collector Road Type A would perform the roading and active transport link functions through the site.
- 88 The submission also notes that sub area G on the eastern side of the submitters land is particularly narrow, and should be widened to a consistent width for the length of that boundary to ensure the land can be reasonably used and developed.
- 89 After consideration of this eastern boundary and in response to this submission, and to other submissions regarding the eastern boundary treatment it is proposed that collector road type B is moved out to form the boundary of the variation area. This would result in removing sub area G and combining it with sub area F. This effectively utilises the collector road as a landscape buffer between the proposed MDR zone and the existing rural zone to the east. From an urban design

perspective this provides a more appropriate edge condition to the proposed development and offers a public edge with layered tree planting and vegetation buffer areas. Given that this 'landscape buffer' will provide a more appropriate boundary condition to the rural land it is proposed that the two story height restriction that did apply to sub area G could be removed. This proposal is described in detail in Mr Lowe's evidence.

### **Fire safety / emergency**

- 90 Fire and Emergency New Zealand (FENZ) (submitter 36), and AA Southern Lakes (submitter 56) raise concern around access for fire and emergency vehicles in the medium and high density neighbourhoods, coupled with narrow roads, car parking provision, and laneways or units with no driveways.
- 91 At the TPLM Structure Plan level the carriageway width of the primary road network is sufficient to allow for emergency vehicle access. FENZ require a carriageways of no less than 4m to accommodate a fire appliance. The primary road cross sections vary but the narrowest has a 5.5m wide carriageway. The TPLM Variation proposes some indicative street cross sections for neighbourhood roads, however the detailed design of these roads and laneways would be completed at resource consent stage of the staged development, at which time the overall design would be required to comply with council and fire and emergency standards.

### **TPLM Structure Plan layout**

- 92 Waka Kotahi New Zealand Transport Agency (**Waka Kotahi**) (submitter 104) notes that success of the structure plan is contingent on modal shift in favour of public transport and active modes of transport, and notes that 'currently, the higher density precincts are located within the rear portion of the Structure Plan area, furthest from the Transport Strategy's proposed bus routes.' Waka Kotahi also note that 'Significant setbacks are also not conducive to achieving the look and feel of an urban environment, which is needed to achieve the lower State Highway speed limits the masterplan envisages.'
- 93 The High Density Residential (HDR) Precinct is located right up to State Highway 6 on the Te Pūtahi Ladies Mile Zoning Plan. HDR does not increase in the rear portion of the Variation area.



- 94 I acknowledge that allowable building heights do increase towards the 'rear portion' of the Variation Area, as can be seen in the Te Pūtahi Ladies Mile Structure Plan – Building Heights. The building heights are reduced closer to State Highway 6 in order to recognise the landscape effects, and respond to the 'arrival experience'. However, even though building heights are reduced, there is still a minimum 2 storey overlay closest to State Highway 6.
- 95 Density standards for the HDR Precinct as it currently stands, is for development to achieve a density of 60 – 72 residential units per hectare across the gross developable area of the site. This higher density precinct contributes to a mode shift by creating a critical mass of people to support improved public transport, and by placing people within easy 5-6 minute walking distances from key amenity such as bus stops and the commercial centre, thereby reducing the need for vehicle trips.
- 96 The building setback or Building Restriction Area (**BRA**) from SH6 is 25m from the SH6 boundary and includes a 20m Amenity Access Area (**AA Area**). Noting also that this setback reduces to 10m along the length of the Commercial Precinct.
- 97 Whilst the BRA and AA Area does create some space between the SH6 and buildings in the MDR and HDR, the Variation provides for this space to be utilised, still retaining the 'look and feel' of an urban environment. It is my opinion that the required density, height overlay, and design intent of the Amenity Access area combine to create an urban environment, whilst balancing the landscape objectives of a green corridor for SH6.

### **Rezoning Submissions**

#### *Jo and Matt Dobb (submitter 37)*

- 98 Jo and Matt Dobb (submitter 37) seek to rezone their land at 13 Ada Place which is directly adjacent to the variation area on the southern side of SH6. The land is currently zoned rural and the submitter is looking to rezone the land so that the upper terrace of it, adjoining SH6, could be developed as medium or low density housing.
- 99 In my opinion rezoning of this land for housing is not consistent with the urban design outcomes for the TPLM Structure Plan. The strategy for SH6 is quite clear in that it promotes an urban edge on the northern side with a 25m building setback, whilst retaining larger setbacks to the

southern side of SH6 to maintain open amenity areas consistent with the length of SH6, as well as views across to the Remarkables.

- 100 The land directly adjacent to the submitters site is zoned open space precinct and will be open sports fields. Housing on the upper terrace in this location would be highly visible and inconsistent with the character of the southern side of SH6 that is proposed.

*Wayne Stiven (submitter 65)*

- 101 Wayne Stiven (submitter 65) opposes Koko Ridge (on the southern side of SH6) being rezoned to Medium Density Residential. The TPLM Structure Plan and Variation does not propose this land to be zoned Medium Density Residential, but rather Low Density Residential. This is consistent with consents that are already in place for this land, and is a response to the traffic constraints. From an urban design perspective Low Density Residential is appropriate in this location due to the distance from the commercial centre and other proposed amenity on the north of SH6.

*Doolytle & Son Limited (submitter 81)*

- 102 Doolytle & Son Limited (submitter 81) are seeking that land they own at Lot 2 DP 536321 and Lot 403 DP 322452 be included in the variation and zoned commercial in the first instance or HDR.
- 103 I do not support zoning of this land for commercial activity. The Structure plan has been designed to locate commercial activity in a consolidated location at the centre of the TPLM development area. From an urban design perspective this provides the greatest accessibility for most residents and will give a 'heart' to the Ladies Mile area with a critical mass of activity and energy. I do not support diluting this commercial centre by allowing for large scale commercial activity in other residential precincts.
- 104 I do not support zoning this land for HDR as this would be inconsistent with the surrounding land use zoning on the south side of SH6. HDR zoning would enable a height limit of up to 24.5m and would have potentially significant visual impact on the adjacent open space of the sports hub. The impact on traffic for a higher residential zoning in this location would also need to be assessed.

*The Roman Catholic Bishop of Dunedin (submitter 82)*

- 105 The Roman Catholic Bishop of Dunedin (submitter 82) seeks a bespoke education and places of worship activity.
- 106 It is my understanding that education and community activities are discretionary within the current TPLM Variation provisions, which would not preclude the development of a school and church.
- 107 From an urban design perspective the location of the site in question, within the MDR zone, for such an activity would be appropriate in that it would not be removing developable land (for housing) from high density zones in close proximity to the commercial centre.

*Winter Miles Airstream Limited (submitter 94)*

- 108 Winter Miles Airstream Limited (submitter 94) is seeking to allow 5000m<sup>2</sup> of commercial precinct to be added to land which it owns which is currently zoned HDR.
- 109 The Structure plan has been designed to locate commercial activity in a consolidated location at the centre of the TPLM development area. From an urban design perspective this provides the greatest accessibility for most residents and will give a 'heart' to the Ladies Mile area with a critical mass of activity and energy. I do not support diluting this commercial centre by allowing for such large scale commercial activity in other residential precincts.

*David Finlin (submitter 101)*

- 110 David Finlin (submitter 101) notes that land on the eastern side of their property (Sub area G) is narrow and should be widened for a consistent width for the length of that boundary to ensure the land can be used and developed.
- 111 I do not support moving the variation boundary further to the east. After consideration of this eastern boundary and in response to this submission, and to other submissions regarding the eastern boundary treatment, it is proposed that collector road type B is moved out to form the boundary of the variation area. This would result in removing sub area G and combining it with sub area F. This effectively utilises the collector road as a landscape buffer between the proposed MDR zone and the existing rural zone to the east. From an urban design

perspective this provides a more appropriate edge condition to the proposed development and offers a public edge with layered tree planting and vegetation buffer areas. Given that this 'landscape buffer' will provide a more appropriate boundary condition to the rural land it is proposed that the two story height restriction that did apply to sub area G could be removed. This proposal is described in detail in Mr Lowe's evidence.

*The Trustees of the Anna Hutchinson Family Trust (submitter 107)*

- 112 The Trustees of the Anna Hutchinson Family Trust (**Anna Hutchinson Family Trust**) (submitter 107) has requested that the Te Pūtahi Ladies Mile Zone is extended to the west to include land that they own and to rezone this land as Medium Density Residential and Low-Density Residential Precincts.
- 113 The submission argues that the land should be included on the basis that it is 'directly linked' to the Frankton urban area and that given the proximity of existing infrastructure and amenities this area would be considered 'low hanging fruit' for delivering desperately sought urban development.
- 114 As described throughout my evidence it is the intent of the TPLM Structure Plan and Variation to create high quality walkable neighbourhoods that integrate transport and land use objectives. This, in my view, will be achieved by concentrating development around proposed transport and amenity infrastructure as is proposed in the Structure Plan.
- 115 If the submission to extend to the west is successful it would be providing for housing away from the amenity that is being proposed to support the creation of walkable liveable neighbourhoods, and to support the mode shift targets of the project, namely; the commercial centre, sports hub and community facilities, potential high school, open space amenity, and bus stops along SH6.
- 116 From an urban design perspective this would undermine the objectives of the TPLM Structure Plan and Variation by diluting the density that is sought around the proposed amenity and would likely lead to a more business as usual approach to car orientated development.

**Overall conclusion regarding the proposal**

- 117 It is my opinion that the approach to higher density living, combined with the spatial arrangement of the Structure Plan and associated provisions, will achieve the outcomes sought by QLDC, represents an efficient use of land, and will provide for positive urban design outcomes.
- 118 Through a considered and holistic approach to developing the TPLM Structure Plan and TPLM Variation it is my opinion that the proposed TPLM Variation will result in an integrated and well-functioning urban environment consisting of well-connected liveable neighbourhoods.

**Stuart James Dun**

**29 September 2023**