

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

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

STATEMENT OF EVIDENCE OF DAVID JOHN COMPTON-MOEN
Dated: 20 October 2023

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Qualifications and Experience

- 1 My full name is David John Compton-Moen.
- 2 I am a Director at DCM Urban Design Limited, which is a private independent consultancy that provides Landscape and Urban Design services related advice to local authorities and private clients, established in 2016.
- 3 I hold the qualifications of a Master of Urban Design (Hons) from the University of Auckland, a Bachelor of Landscape Architecture (Hons) and a Bachelor of Resource Studies (Planning and Economics), both obtained from Lincoln University.
- 4 I have been a Registered Landscape Architect of the New Zealand Institute of Landscape Architects ('NZILA') since 2001, a full member of the New Zealand Planning Institute, since 2007, and a member of the Urban Design Forum since 2012.
- 5 I have worked in the landscape assessment and design, urban design, and planning fields for approximately 25 years, here in New Zealand and in Hong Kong.
- 6 During this time, I have worked for both local authorities and private consultancies, providing expert evidence for urban design, landscape and visual impact assessments on a wide range of major infrastructure and development proposals, including the following relevant projects:
 - (a) Stage 3 Proposed District Plan Design Guides – Residential (High, Medium and Lower Density and Business Mixed Use Zones) for Queenstown Lakes District (2018-2020). Working with QLDC staff and Vivian Espie, we prepared Design Guides for Residential and Business Mixed Use Zones. The Residential design guide covers High, Medium and Lower Density zones. The guides are designed to assist developers when breaches in District Plan standards may occur, suggesting possible design solutions to achieve a positive design outcome. Work was completed in mid-2019 with evidence being prepared for the Stage 3 Hearings of the PDP. We have recently updated the guides in response to changes in National legislation.
 - (b) Working with QLDC staff (2017-18), a high-level indicative master plan showing residential development opportunities on the Ladies

Mile was prepared. The indicative master plan was prepared to ensure an integrated urban development of the Ladies Mile as a possible Special Housing Area under the HASHAA legislation. The plan was accepted by Council and incorporated into the Lead Policy. It promotes a mix of densities and housing typologies while providing large areas of open space and recognising the unique landscape values of the receiving environment. I am still working with council reviewing Expressions of Interest which are being submitted for the area of Ladies Mile north of the State Highway.

- (c) Urban Design evidence was prepared for Queenstown Lakes District Council, investigating the proposed rules for development at Jacks Point (PDP Stages 1 and 2) (2016-19). Evidence focused on proposed density rules, changes to height, set back requirements and site coverage. Graphic examples were prepared to test various design scenarios and then to support the proposed threshold for Medium Density Residential development using a Comprehensive Development Plan process for Restricted Discretionary activities.
- (d) In 2018, I worked on a possible SHA development on the Koko Ridge site (then Laurel Hills) The Property Group and the client on the development of a Special Housing Area at the western end of Ladies Mile, adjacent to Shotover Country. The project involved the development of a 3,000m² open space; streetscape design; landscape design of the state highway edge and a Landscape and Visual Impact Assessment.
- (e) Hutt City Council providing urban design evidence for Plan Change 43. The Plan Change proposed two new zones including a Suburban Mixed-use and Medium Density Residential as well as providing the ability for Comprehensive Residential Developments on lots larger than 2,000m² (2017-2019). The Medium Density Design Guide was a New Zealand Planning Institute Award winner in 2020.
- (f) 2020-21 – Working with Waimakariri District Council to assist with developing structure plans for Kaiapoi, Rangiora Northeast, Rangiora Southeast and Rangiora West.

- (g) 2020-21 – Working for Mike Greer Homes, I have worked on the master planning, urban design and landscape design for the following Medium Density Residential and Mixed-Use Developments:
 - (i) 476 Madras Street – a 98-unit residential development on the old Orion Site.
 - (ii) 258 Armagh Street – a 33-unit residential development in the inner city.
 - (iii) 33 Harewood Road – a 31-unit development adjacent to St James Park in Papanui.
 - (iv) 2020-21 – Working with Waimakariri District Council, I have assisted with the development of four structure plans for future urban growth in Rangiora and Kaiapoi.

7 I am very familiar with the area of land that is the subject of plan change Te Pūtahi – Ladies Mile as well as the site and surrounding environment.

CODE OF CONDUCT

8 I confirm that I have prepared this evidence in accordance with the Code of Conduct for Expert Witnesses Code of Conduct for Expert Witnesses contained in Part 7 of the Environment Court Practice Note 2023.

9 The issues addressed in this statement of evidence are within my area of expertise except where I state that I am relying on the evidence or advice of another person.

10 The data, information, facts and assumptions I have considered in forming my opinions are set out in the part of the evidence in which I express my opinions. I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

SCOPE OF EVIDENCE

11 As outlined above, I have previously acted for Koko Ridge with respect to advising on resource consent RM211276, having provided a reported dated 9 September 2022 (the Report). A copy of the Report is attached to this statement of evidence as annexure 1.

- 12 The Report to QLDC which set out my evidence with regards to a visual assessment of the development proposed to be undertaken on resource consent RM xxx. I stated in the Report in relation to adjacent land owned by the Corona Trust (submitter #99) in this plan change:
- “Following the implementation of the recommended mitigation, I consider that the future dwellings in Lots 28-30 following mitigation will have a **Low (less than minor)** effect on visual amenity for the adjoining property at 53 Maxs Way”.*
- 13 I have reviewed the conclusions I reached in the Report, particularly the considerations as to whether my opinion and conclusions expressed in the report would change with respect to the proposed zone rules with respect to the H2 area.
- 14 It is my opinion, that the conclusions and content of the Report remain applicable and relevant to the consideration of visual effects of Plan Change Te Pūtahi.
- 15 The nature and scale and nature of visual effects on the visual amenity for the adjoining property at 53 Maxs Way would, after the implementation of the mitigation described in the RC 211276, remain low or in other words, less than minor.
- 16 However, I also consider that if the lot density was to be increased my opinion would remain unchanged. That is because I consider that the H2 zone is capable of absorbing 17 residential units per hectare with visual effects remaining less than minor.
- 17 For the avoidance of doubt, if a higher density than 17 residential units per hectare is under consideration, then it would be necessary to conduct a new visual effects assessment.

Dave Compton-Moen

Dated: 20 October 2023