



District Plan Urban Design Review

NPS-UD Implementation

Queenstown Lakes District

15 May 2023



Urban & Environmental

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1.0 Introduction

1.1 Purpose

The purpose of this memo is to provide a high-level urban design review of the Queenstown Proposed District Plan (**PDP**) in light of changes to national direction introduced by the National Policy Statement on Urban Development 2020 (**NPS-UD**). This includes identifying provisions of the PDP which may already be consistent with the enabling intent of the NPS-UD or alternatively identifying potential barriers and conflicts which may need to be amended to align with the built form outcomes now anticipated.

This review is intended to help scope out and inform an “intensification plan change” and supporting Section 32 analysis. This includes recommendations around new design related objectives, policies or development standards with reference to comparable approaches to enabling intensification under the NPS-UD from around New Zealand.

1.2 Scope

The scope of this review is focused on residential and commercial zones (excluding industrial) within the Queenstown Lakes urban environment under the PDP. In addition, there are a number of special zones under the Operative District Plan which have not been altered through the PDP process. These areas were considered as part of an Accessibility and Demand Analysis undertaken by B&A in mid-2022. Where these special zones may have performed well in terms of their accessibility or relative demand, this review has not yet made recommendations for changes as I understand the ODP zones will be comprehensively reviewed at a later stage.

It is important this report is read in conjunction with the Method Statement and supporting map series of the Accessibility and Demand Analysis dated August 2022. This report includes recommendations for amendments to the spatial extent of various zones within the PDP. The spatial extent of any zoning along with its associated package of objectives, policies and standards needs to be delivered together to align with the national direction set out within the NPS-UD. As will be set out throughout this report, simply amending existing zone boundaries is unlikely to give effect to the requirements of the NPS-UD or be well aligned with good urban design practice.

1.3 Reference Material

In carrying out this review, the following documents have been considered:

- Relevant PDP Zone Chapters;
- S42A Reports – Chapters 7 (Low Density Residential), 8 (Medium Density Residential), 9 (High Density Residential), 10 (Arrowtown Residential Historic Management Zone), 12 (Queenstown Town Centre), 13 (Wānaka Town Centre), 14 (Arrowtown Town Centre), 15 (Local Shopping Centres), and 16 (Business Mixed Use);
- Residential Zone Design Guide 2021;
- Queenstown Town Centre Special Character Area Design Guidelines 2015;
- Queenstown Town Centre Masterplan;
- Frankton Masterplan;

- Te Pūtahi Ladies Mile Masterplan (notified version);
- Business Mixed Use Zone Design Guide 2021;
- Wānaka Town Centre Character Guideline 2011;
- Arrowtown Design Guidelines 2016;
- Business Chapters – Urban Design Evidence, prepared by Timothy Church (2016);
- Residential Chapters - Urban Design Evidence, prepared by Garth Falconer (2016);
- Report 11 – Stream 8 – Chapters 12, 13, 14, 15, 16 and 17 – Report and Recommendations of Independent Commissioners;
- Plan Change 50 Environment Court Decision (Part 1 and Part 2);
- Queenstown Lakes Spatial Plan 2021; and
- Heart of Wānaka – Draft Town Plan.¹

2.0 Policy Context

2.1 Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021

The Amendment Act 2021 is designed to improve housing supply in New Zealand's largest cities by speeding up implementation of the NPS-UD and increasing provision of medium density housing through the creation of the Medium Density Residential Standards (**MDRS**). Specified territorial authorities are required to ensure every relevant residential zone incorporates the MDRS as well as include the objectives and policies set out in clause 6 of Schedule 3A.

Specified territorial authorities include Auckland, Hamilton (incl. Waipa & Waikato), Wellington (incl. Lower Hutt, Upper Hutt, Porirua and Kapiti Coast), Tauranga (incl. Western Bay of Plenty), Christchurch (incl. Selwyn & Waimakariri) and Rotorua. Queenstown Lakes is not a specified territorial authority.

2.2 National Policy Statement on Urban Development

The NPS-UD requires councils to plan well for growth and ensure a well-functioning urban environment for all people, communities and future generations. There are a number of objectives and policies within the NPS-UD that are of particular relevance when considering the spatial distribution of more intensive housing, including (emphasis added):

Objective 1: *New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

Objective 3: *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

(a) the area is in or near a centre zone or other area with many employment opportunities.

¹ A community-led document, not developed or endorsed by QLDC.

Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Objective 6: Local authority decisions on urban development that affect urban environments are:

- (a) integrated with infrastructure planning and funding decisions (insofar as this relates to transport)

Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.

Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

- (a) have or enable a variety of homes that:
 - (i) meet the needs, in terms of type, price, and location, of different households
- (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport

Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or
- (b) relative demand for housing and business use in that location.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

- (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement
- (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:
 - (i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
 - (ii) are not, of themselves, an adverse effect
- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

2.2.1 Amenity Values

Section (7)(c) and (f) of the RMA requires that all persons exercising functions and powers under the Act have particular regard to the maintenance and enhancement of amenity values and the quality of the [built] environment. Urban design is often closely aligned with concepts of urban amenity and matters traditionally developed to respond to sections 7(c) and (f) of the RMA.

It is anticipated that giving effect to the NPS-UD will result in change to the existing built form of urban environments. Objective 4 and Policy 6 of the NPS-UD recognises that while changes to existing built form may detract from amenity values appreciated by some people, they may also improve amenity values appreciated by other people, communities and future generations. These changes to urban built form are not, of themselves, an adverse effect. This change does not mean that amenity values are downplayed or can be ignored, but rather the concept of “amenity values” is expected to evolve and be replaced or upgraded with new matters which can be grouped together in a wider bundle of matters which define the concept of amenity.

Any changes to the District Plan need to ensure that values associated with existing built form and character can be managed in a manner that gives effect to the NPS-UD. While this means greater heights and densities of urban built form will be required in accordance with Policy 5 of the NPS-UD, new rules and amendments to a range of other inter-related standards can be used to ensure new building typologies and development achieve an appropriate level of amenity within their local context. This is in accordance with the consideration of the outcomes to be achieved for a ‘well-functioning urban environment’ (Policy 1) in a Queenstown Lakes context, and provides opportunity for new development to contribute positively to amenity values as the built environment changes over time.

2.2.2 Commensurate building heights and densities

Although only applicable to Tier 2 and 3 authorities, Policy 5 of the NPS-UD should be considered in light of the directions also provided for under Policies 3(c) and (d) for Tier 1 urban environments, the MDRS and National Planning Standards. These provide context for the stronger push by Central Government towards a greater centres-based approach to intensification set out within the NPS-UD. These have also established a nationally consistent continuum from which to consider building heights and densities as they relate to both medium density and high density residential development (for example, “medium density” refers to development up to three-storeys in height). Queenstown Lakes does not feature existing or planned rapid transit, city centre zones or metropolitan centre zones. However, the Queenstown Lakes Spatial Plan (**Spatial Plan**) includes aspirations for the development of metropolitan centres in Queenstown Town Centre and Frankton (refer to Section 2.5 below). The implication of Policies 3(c) and (d) is that areas with high levels of accessibility (which is influenced, in part, by the range of commercial and community services available in any given area) in and around larger centres within Tier 2 urban environments could be commensurate with higher order centres in Tier 1 urban environments and should consider provision of up to six storey buildings (or probably higher in places like Queenstown Town Centre and Frankton noting the Spatial Plan aspirations), with other areas close to smaller centres considering a level of development similar to that provided for by the MDRS.

To help understand potential design responses an analysis of approaches to heights, densities and development standards across New Zealand is provided in Appendix 1 of this report.

2.2.3 Summary

Read as a whole, the NPS-UD, insofar as it relates to urban design matters is seeking:

- A greater variety of housing typologies (including dwelling sizes and cost). This in and of itself is a positive amenity effect which should be enabled;
- Increased densities of residential development in areas of good accessibility and demand noting that proximity to services is itself an important amenity and can better support reduction in greenhouse gas emissions through decreased need to travel via private vehicle;

- The urban built form needs to change to address issues around affordability, demand and climate change.

2.3 Proposed Otago Regional Policy Statement 2021

The Proposed Otago Regional Policy Statement 2021 (**PRPS**) was notified in June 2021 and sets the direction for future management of Otago's natural and physical resources. The PRPS was developed, in part, to give effect to the relevant objectives and policies of NPS-UD. Objectives and policies of particular relevance to this report include:

UFD-O2 – Development of Urban Areas

The development and change of Otago's urban areas:

- (1) improves housing choice, quality, and affordability,
- (4) delivers good urban design outcomes, and improves liveability,
- (8) results in sustainable and efficient use of water, energy, land, and infrastructure,
- (10) achieves consolidated, well designed and located, and sustainable development in and around existing urban areas as the primary focus for accommodating the region's urban growth and change,

UFD-P3 – Urban intensification

Within urban areas intensification is enabled where it:

- (1) contributes to establishing or maintaining the qualities of a well-functioning urban environment,
- (2) is well-served by existing or planned development infrastructure and additional infrastructure,

2.4 Proposed District Plan

The District Plan review commenced in 2015. The subsequent Proposed District Plan (**PDP**) set out to provide a clear strategic direction for the urban growth across the district as well as additional scope for intensification. Chapter 4 of the PDP sets out the strategic direction for urban development, with the majority of the policy framework appearing to have been developed/ confirmed prior to the development of the NPS-UD. Key objectives and policies relating to intensification and housing development include:

4.2.2A Objective - *A compact, integrated and well designed urban form within the Urban Growth Boundaries that: (i) is coordinated with the efficient provision, use and operation of infrastructure and services; ...*

4.2.2.2 Allocate land within Urban Growth Boundaries into zones which are reflective of the appropriate land use having regard to:

- (a) its topography;
- (b) its ecological, heritage, cultural or landscape significance if any;
- (c) any risk of natural hazards, taking into account the effects of climate change;
- (d) connectivity and integration with existing urban development;
- (e) convenient linkages with public transport;
- (f) the need to provide a mix of housing densities and forms within a compact and integrated urban environment;

(g) the level of existing and future amenity that is sought (including consideration of any identified special character areas); ...

4.2.2.3 Enable an increased density of well-designed residential development in close proximity to town centres, public transport routes, community and education facilities, while ensuring development is consistent with any structure plan for the area and responds to the character of its site, the street, open space and surrounding area.

2.5 Queenstown Lakes Spatial Plan

The Spatial Plan is a vision and framework for how and where the communities of the wider Wakatipu and Upper Clutha can “Grow Well” and develop to ensure our social, cultural, environmental and economic prosperity through to 2050 and was adopted in 2021. The NPS-UD came into effect during preparation of the Spatial Plan. As such, the Spatial Plan is not a Future Development Strategy but has been prepared to be consistent with the direction of the NPS-UD to provide sufficient development capacity and achieve well-functioning urban environments.

The Spatial Plan adopts a “consolidated approach to growth” which aims to increase the variety and affordability of housing. This will require enabling more high and medium density housing in appropriate locations within both Queenstown and Wānaka. The typologies and their indicative spatial application are set out on Page 54 and include in Figure 1 below for reference. It also shows the Spatial Plan’s aspirations for both Queenstown Town Centre and Frankton to become Metropolitan Centres and for a frequent public transport network to be established in the Wakatipu. A key enabler to support the emergence of metropolitan centres as well as support for the viability of a frequent public transport network will be greater levels of intensification in these areas. Figure 1 provides a useful baseline for considering commensurate heights and densities within the Queenstown Lakes urban environment and has already been subject to extensive public consultation and a hearings process under the Local Government Act 2002.

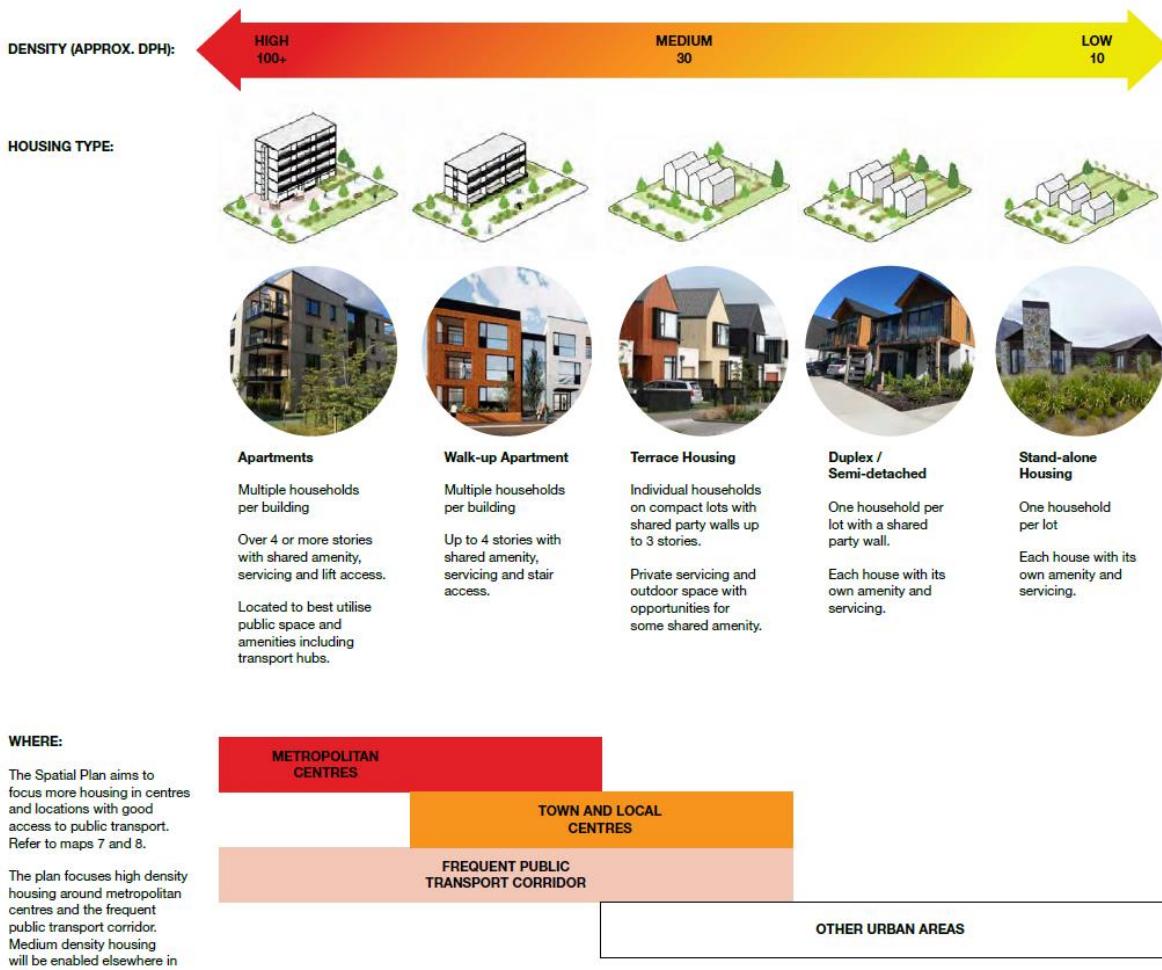


Figure 1 - Housing Choice approach within the Queenstown Spatial Plan

2.6 Summary

There is a clear national, regional and local policy framework to promote and enable residential intensification of existing urban areas with a particular focus on locating intensification in areas which would better support the use of active modes of transport, reduce private vehicle use and contribute to more vibrant, well-functioning centres.

This is consistent with good urban design practice, which considers the optimal spatial arrangement of land uses relative to each other that results in the most efficient use of land. From an urban design perspective there are a number of benefits associated with intensification of residential activities in and around centres, including:

- more efficient use of scarce urban / residential zoned land;
- infrastructure efficiencies, for example a reduced need to extend reticulated water or transport networks;
- passenger transport becomes more viable in terms of reduced subsidies and more frequent services through increased patronage;

- public health benefits in terms of facilitating travel mode changes to active modes by enabling more people to live near key amenities and destinations, making walking or cycling viable modes of transport for everyday living;
- associated environmental (reduce carbon and particulate emissions) and economic benefits (reduced vehicle running costs) stemming from reduced reliance on cars and fewer car trips per household;
- increased housing choice to cater for a range of different households due to changing demographics;
- related to the above, opportunities for people to 'age in place' by changing household types as they transition through life-stages rather than having to move around a district or region based on the limited availability of different house types in any given location; and
- stronger local economies and business viability associated with increased population densities within particular market catchment areas.

3.0 Lower Density Suburban Residential Zone

3.1 Review

The Lower Density Suburban Residential Zone (**LDSRZ**) is currently the most expansive residential zone across the District. The overall intent of the objectives, policies and standards of the LDSRZ seek to maintain predominantly single-level, large detached homes on large sites. There is some limited potential for infill development with sites as small as 300m² requiring consent as a restricted discretionary activity, with anything smaller becoming a non-complying activity. The rule framework does not enable or support site amalgamation or seek to maximise opportunities for redevelopment on large or vacant sites within the zone.

In this regard, there is little ability to provide for a variety in housing typologies, sizes or prices in what comprises a large portion of the existing urban environment. Whilst noting that the LDSRZ seeks to enable a lower intensity form of development, from an urban design perspective and considering national policy direction, the objectives, policies and standards raises several issues including:

- It reduces housing choice over a large portion of the existing urban environment. This reduces the zone's ability to cater for a range of different households;
- Related to the above, it prevents opportunities for people to 'age in place' by changing household types as they transition through life-stages and increases the potential of having to move around a town, district or region based on the limited availability of different house types in any given location; and
- It's a less efficient use of scarce urban / residential zoned land (in terms of housing yield) and increases pressure for further greenfield expansion in areas less well suited to urbanisation.

Based on the accessibility and demand analysis undertaken, the issues above could be predominantly addressed by reconsidering the spatial extent of the LDSRZ as recommended in the *Method Statement – Accessibility & Demand Analysis – NPSUD Policy 5*, dated August 2022.

3.2 Density

A default density of one dwelling per 450m² with the ability to deliver densities of one residential unit per 300m² via a restricted discretionary activity consent is considered a reasonable approach towards density and

allows for the potential for some detached infill development to occur throughout the zone.² I note that a site size of 300m² is fairly consistent with more intensive greenfield detached development that are currently or have recently been developed in many places across New Zealand, including Queenstown Lakes. However, in combination with the development standards and a non-complying activity status for development denser than 1 dwelling per 300m², the LDSRZ restricts opportunities for meaningful variety in housing typology in situations where it may be appropriate and/or result in positive design outcomes (e.g. increased passive surveillance over streets or public open spaces, more efficient use of urban land, or increased housing choice to allow people to age in place). The retention of some form of density controls in the LDSRZ could be complimented through provisions which provide some more opportunity/ flexibility for infill-type development (e.g. a minor dwelling, or small secondary unit). Options to achieve this, in addition to a reduction in the overall extent of the LDSRZ, could include:

- The re-introduction of a Comprehensive Development Activity (as per the former ODP) on sites with a minimum area of approximately 1,500m²; or
- Amendment of the requirement for development to achieve a net density to 300m² to an average density of 300m² under Rule 7.4.8. This would provide an opportunity to enable some smaller-scale subdivision around existing buildings or for a more comprehensive redevelopment, albeit at the same overall density.

There would be urban design benefits of both approaches, including potential for greater housing variety and more affordable housing (through reductions in the land area price component of new builds). Development under either option could be provided for as a restricted discretionary activity and subject to a design assessment to ensure appropriate design outcomes are satisfied. Either option would provide opportunities to deliver more efficient forms of intensification on sites of a scale where potential adverse effects can be more adequately internalised.

3.3 Subdivision

Comprehensive development or an amendment to the average density rule would need to be supported by an amendment to the relevant subdivision controls covering the LDSRZ. Rule 27.7.31 should be broadened (or a new rule developed) to specifically exempt the type of development discussed above from the minimum allotment size and dimension rules provided the subdivision is in accordance with an approved land use consent for that development and/or a concurrent land use – subdivision application.³ I also would not consider it necessary to tie any exemption to the existence of an established residential unit as Rule 27.7.31 requires.

With regard to minimum site sizes for vacant lots, the adoption of a minimum site size of 300m² in line with the density provisions would be appropriate and can comfortably accommodate typical detached residential typologies with a high level of amenity (refer to Figure 2). I also consider that there is scope to amend the minimum dimension of sites within the LDSRZ from 15m x 15m as it currently stands to 12m x 15m. A 12m width can still comfortably accommodate a typical detached dwelling and required side-yards but provides some additional design flexibility in terms of lot design and can also support a more efficient block structure that enables more dwellings to have direct access onto a road corridor.

² Subject to expansion of more intensive residential zones in areas where the LDSRZ performs well within the accessibility and demand assessment.

³ Although outside my area of expertise, I am aware that approval of subdivision consent/ s223 is often an important milestone that must be met before financing for construction is released from a lender. Tying subdivision with the physical development may therefore act as a barrier to redevelopment.

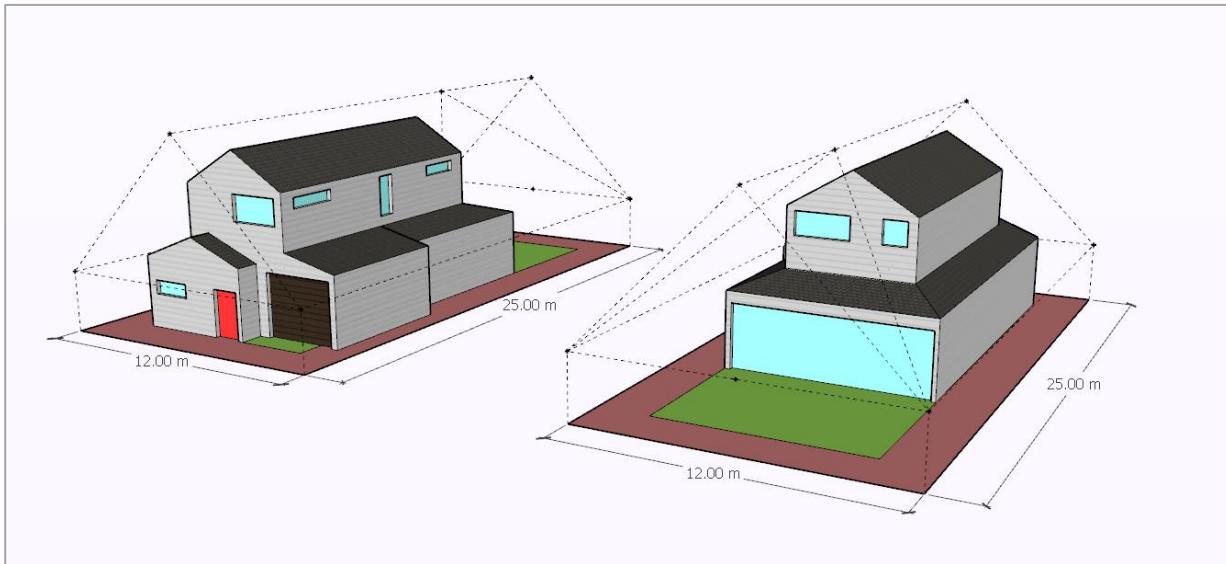


Figure 2 – Example of a 180m², two-storey dwelling on flat, 300m² lot complying with all LDSRZ standards

3.4 Building Heights

The LDSRZ contains a number of varying height restrictions depending on the location and area of the site. Interestingly, it features maximum building height limits of 5.5m, 6.5m, 7m and 8m which are generally intended to provide for two-storey development.

Height limits of 5.5m applying to sites under 900m² are poorly aligned with building code requirements and make the delivery of a second storey challenging without either delivering lower internal amenity via reduced ceiling heights or increasing development costs by necessitating an increase in earthworks to conform to the 5.5m height limit. These restrictions which limit height can have the effect of limiting on-site amenity appear to be in place to maintain a form of “residential amenity” for neighbouring residents.

As a general principle, height limits should be set to enable good levels of internal amenity for residents whilst acknowledging likely building typologies. At a minimum, a floor-to-floor height of 3m should be used as the basis for setting building heights, this allows for around a 2.7m floor-to-ceiling height. Increased ceiling heights are generally beneficial in areas with lower/ limited sunlight angles as this provides for increased ability for sunlight penetration within a building floorplate. In addition to consideration of floor-to-floor heights, allowance should also be given to the provision of sloping roof forms. A 20-degree gabled roof pitch would give rise to 2m of building height over a floor plate 10m wide. Based on this, the 8m height limit which currently applies to flat sites in Queenstown would be an appropriate height to apply across the LDSRZ.⁴ An increase to 8m would still ensure a two-storey suburban environment is maintained but would have the benefit of better enabling comprehensive developments.

3.5 Recession Planes

Rule 7.5.7 sets out a series of recession planes based on orientation of various boundaries, with more enabling provisions related to the northern boundary vs the southern boundary with exemptions applying to road, park or town centre boundaries. Based on the reduced spatial extent of the zone I have recommended and the anticipated built form outcomes I am of the opinion that retention of these controls remains appropriate.

⁴ This would also require a consequential change to Policy 7.2.3.2 and Rule 27.7.32.1(b).

The provisions also exempt buildings on sloping sites (excluding accessory buildings) from the recession plane controls. I discuss the potential impact/ issues this has in relation to the Medium Density and High Density residential zones in Section 4.1 and 5.1 below. The impact of the existing recession planes on sloping sites (noting the intended built form outcomes of the zone of one-to-two storey detached dwellings) is not readily apparent. There may be potential issues on smaller sites (ca. 450m²) on south facing slopes at angles comparable to the 35° recession plane looking to construct large two-storey dwellings, but such instances are likely to be very rare. Consistent with my recommendations for other residential zones, the PDP would benefit from simplification by removal of different recession plane standards between flat and sloping sites in the LDSRZ. In addition to the above change, consideration should be given to amending the activity status for any infringement to Restricted Discretionary as the potential effects of any infringements are well understood (e.g. shading, visual dominance, privacy). This would allow for a design assessment of infringements where slope is a key contextual factor impacting on building design but not give rise to any overly onerous and uncertain consenting pathway created by a non-complying activity status.

3.6 Other Standards

There are a number of other existing standards which are not considered would unduly restrict development of more suburban typologies within the LDSRZ.⁵ This includes standards relating to maximum building length above ground floor, building coverage, building setbacks, building separation, waste space and landscaped permeable area standards.

3.7 Hāwea

As with other smaller towns across the District, Hāwea scored relatively poorly in terms of its accessibility. There are a number of open space opportunities as well as a small commercial centre and community centre but the majority of its needs are serviced from Wānaka. The majority of the existing township falls within the LDSRZ. It is relatively isolated location from the larger population and employment centres (approximately 10km from Wānaka), and there is not considered to be any strong justification in urban design terms to enable widespread intensification on levels comparable to Wānaka or Queenstown. Some more minimal opportunities for intensification/infill would be still enabled through recommended changes to building height and changes to associated subdivision rules (e.g. through amended provisions recommended in Section 3.3) which would support combined land-use / subdivision applications.

3.8 Luggate

In an accessibility sense, there are limited amenities available within Luggate for residents and the area performed relatively poorly in the accessibility analysis. It is understood that the eastern area of Luggate was rezoned through the PDP process enabling a higher level of intensification/ development than previously enabled via application of the LDSRZ. Based on its locational attribute's retention of the LDSRZ remains appropriate (noting that development has already commenced in this area). There are not considered to be any strong justifications in urban design terms to enable widespread intensification.

⁵ Subject to inclusion of rules addressing comprehensive developments and potential rezoning in areas of higher accessibility to more intensive residential zones.

4.0 Medium Density Residential Zone

4.1 Review

The National Planning Standards define a Medium Density Residential Zone (**MDRZ**) as “areas used predominantly for residential activities with moderate concentration and bulk of buildings, such as detached, semi-detached and terraced housing, low-rise apartments, and other compatible activities.”

The objectives, policies and standards of the PDP MDR zone are generally not well aligned with enabling typical medium density style development or the definition of a MDRZ under the National Planning Standards. This includes a requirement to “maintain amenity values” and the use of restrictive height, density and sunlight access standards.

It is also noted that there is a difference in approach to sunlight access standards between sloping and flat sites. The effect of this is to make development more restrictive on flat sites which have a benefit of being easier/ cheaper to develop. This results in a significantly different effects envelope being enabled on flat sites than on sloping sites even where these sites may adjoin one another. In this regard, the MDRZ seems to acknowledge that a reduction in existing amenity values is considered appropriate if it is required to enable development anticipated by the zone provisions (refer to Figure 3 below which demonstrates an approximate 90% increase in shading enabled by the varied sunlight admission rules). The underlying rationale for this difference based on the S42A report, appears to have been driven by the proposed MDRZ controls being quite restrictive in the first place. Testing indicates that a consistent approach to flat and sloping sites in terms of recession planes/ height-in-relation-to-boundary (**HIRB**) controls could be adopted with a general relaxation in height and HIRB across both the MDRZ and High-Density Residential Zone.

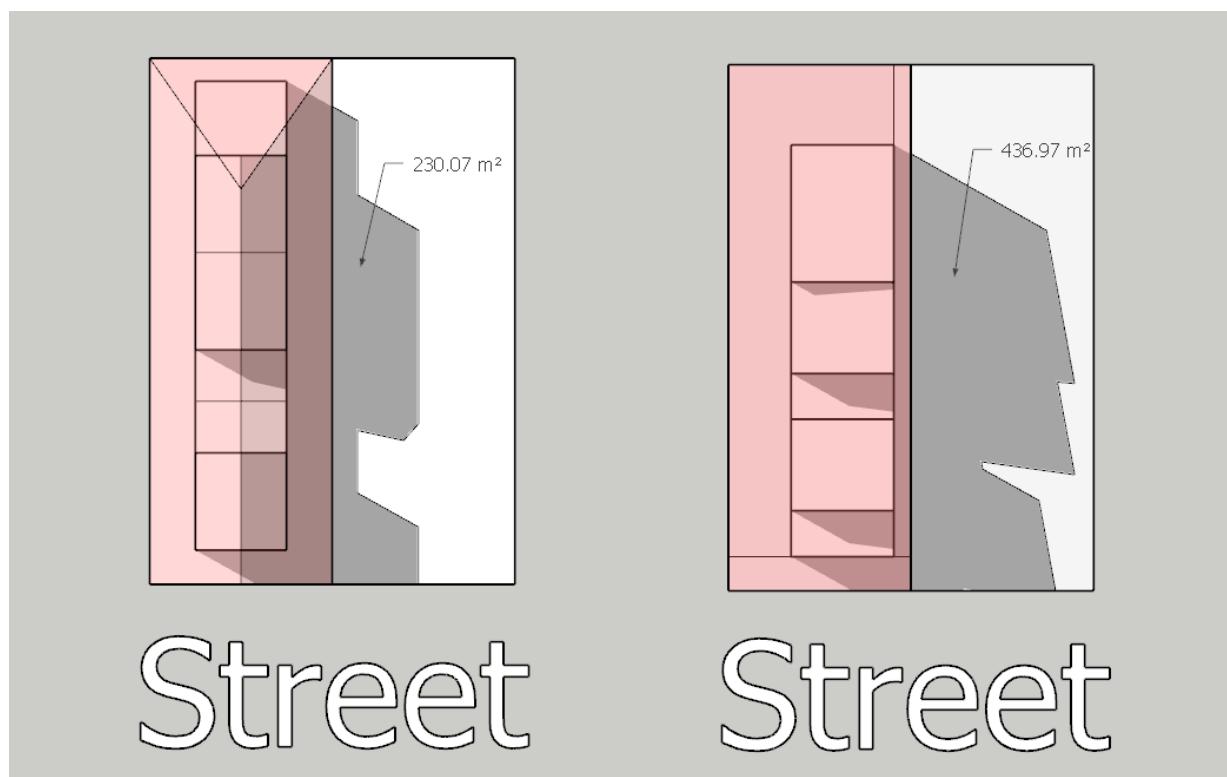


Figure 3 - Example difference in shading effects between flat (left) and sloping (right) sites under the PDP. Model shot is taken at 3pm on 21 September with the models shown fully compliant with all standards.

Overall, it is considered that the current provisions are more aligned with limiting meaningful opportunities for intensification rather than focus on enabling small scale infill development. Similar conclusions were reached by Mr Falconer in his Urban Design Evidence on the residential topic during the hearings on the PDP. Overall, the provisions of the MDRZ as currently contained within the PDP are considered to be misaligned with national policy direction (including national planning standards) or what is considered to be good urban design practice.

4.1.1 Medium Density Residential Standards

The MDRS have been purposefully designed to enable typologies commonly understood as “Medium Density” development and appear to be consistent with the zone description for the MDRZ as set out in the National Planning Standards. The RMA requires tier 1 local authorities to incorporate the MDRS into “relevant residential zones”. As Queenstown Lakes is a tier 2 local authority, the MDRS are not required to be applied.

Whilst Queenstown Lakes is not required to apply the MDRS, they provide a useful benchmark for informing an understanding for what “commensurate” heights and densities may apply to the MDRZ. The MDRS include seven core standards that assist to enable the types of development included within the zone description for the MDRZ within the National Planning Standards. These standards are intended to enable landowners to build up to three houses of up to three storeys on their site as of right on most sites with greater density enabled as a restricted discretionary activity. The MDRS are summarised as follows:

- Density: 1-3 dwellings per site – permitted and 4 or more dwellings – restricted discretionary.
- Height: 11m (with provision for up to additional 1m to enable pitched roof forms).
- Height in Relation to Boundary: 4m + 60 degrees (does not apply to common walls).
- Maximum Building Coverage: 50% of the net site area
- Minimum landscaping: A residential unit at ground floor level must have a landscaped area of a minimum of 20% of a developed site. May be located on any part of the development site, and does not need to be associated with each residential unit.
- Front yard: 1.5m Yards (Side and Rear)/ 1m (excluded on corner sites)
- Dwellings Fronting the Street: Any residential unit facing the street must have a minimum of 20% of the street-facing façade in glazing. This can be in the form of windows or doors.
- Outdoor Living Space - Residential Unit at ground floor: Must have outdoor living space:
 - Minimum 20m² area:
 - where located at ground level has no dimension less than 3m and where provided in the form of a balcony, patio, or roof terrace, is at least 8 square metres and has a minimum dimension of 1.8 metres.
 - May be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.
- Outdoor Living Space Residential Unit above ground floor: Must have outdoor living space:
 - Minimum 8m² area with a minimum dimension of 1.8m.
 - May be grouped cumulatively in 1 communally accessible location or located directly adjacent to the unit.

- Outlook Space: Principal living room outlook 4m depth x 4m width. All other habitable rooms – outlook 1m depth x 1m width.

This represents a different approach to zoning/ controls that has been typically undertaken across New Zealand where more intensive typologies such as walk-up apartments are required to conform with controls designed primarily to enable detached, low-density residential typologies. From an urban design perspective, there are clear benefits to adopting a consistent approach to the development standards covering medium density development. The principal benefit includes national consistency to improve development efficiencies and potentially attract developers from outside of region who would be familiar with these rules from Tier 1 jurisdictions. This will provide greater certainty for the wider development community and an ability to deliver modular or standardised terraced and apartment typologies over a wider area. In this regard, there would be no clear justification or benefit in design terms in requiring bespoke terraced housing or apartment designs⁶ in Queenstown as compared with other urban areas across New Zealand.

It is noted that the MDRS are primarily focussed on developments of 3 or less dwellings. On typical sites with stand-alone dwellings across the District⁷, a feasible development that complies with all permitted standards would generally be able to exceed the minimum requirements set by the MDRS (e.g. more generous private open spaces, outlook areas and setbacks could be accommodated). As such, these are unlikely to give rise to adverse outcomes in terms of on-site or off-site amenity. However, with increased density on any given site there is an increase in design complexity where a range of competing interests around access, privacy, and amenity need to be considered for future occupants and to a lesser extent for surrounding properties. A review of the MDRS has highlighted some potential urban design issues which would require further refinement to the provisions to help deliver a high quality, attractive urban environment. As a Tier 2 local authority, QLDC has the opportunity to utilise aspects of the MDRS to better enable intensification whilst at the same time amending the provisions to better take into account local circumstances and views of the community.

4.2 Density

The existing maximum density standards (1 per 250m² net site area) of the MDRZ are not aligned with typical terraced housing site sizes seen across New Zealand which typically range from 100-180m² in area. They also actively prevent the development of apartment typologies which enable significant efficiencies in site areas by vertically stacking units. This standard also creates a mandate dictating larger sites and less affordable dwellings that may not be responsive to the needs of different households (e.g. a single, retired person looking to downsize). From a design perspective, density limits also have limited value in that they enable large homes which could theoretically have a high occupancy but prevent a number of smaller dwellings which have a comparable occupancy. For example, a four-bedroom home may have five occupants whilst three studio-apartments which occupy the same building envelope may only have four occupants but are nevertheless more tightly controlled through the planning provisions.

In light of the above, it is recommended that density restrictions are removed in their entirety from the MDRZ with permitted development of up to three-dwellings enabled consistent with the approach taken in the MDRS. Instead, the MDRZ should manage density through a design assessment process to ensure appropriate built form and amenity outcomes can be achieved with the existing matters of discretion under Rule 8.5.5 providing an appropriate basis for this assessment. Bulk and location standards (e.g. building coverage) will act as a practical constraint on realisable density albeit focused on built form outcomes.

⁷ Excluding recently developed areas such as North Lake.

Design assessment applied through a resource consent process (which is already a standard process in many zones within the PDP) inherently allows for diversity, innovation and choice in building design. This is important in enabling a greater variety of housing typologies and improving choice for existing and future residents. This is achieved by identifying the types of built-form outcomes required (as is already identified within the Residential Zone Design Guide), rather than prescribing restrictive density standards. The use of a design assessment process also allows for solutions which can respond to the unique conditions of every site and situation in a more comprehensive way than density standards alone.

If Council is minded to retain density controls within the MDRZ, it is recommended that density standards are reduced to at least an average of 1 per 150m². This would provide a degree of certainty as to an anticipated development quantum but maintain a degree of design flexibility to deliver a range of site sizes and typologies to contribute towards housing choice and variety. Contemporary medium density developments which have been comprehensively master-planned have delivered quality detached housing on as little as 150m², whilst terraced housing typologies are delivered on sites as small as 100m². Land requirements decrease even further with attached vertical typologies.

4.2.1 Subdivision

The above would also require amendments to related standards within Chapter 27 – Subdivision and Development.

It is recommended that the minimum vacant lot subdivision standard of 250m² be retained⁸. Rule 27.7.29 could be amended to a minimum lot dimension of 10m x 12m which is more consistent with typical site dimensions seen in more intensive detached residential subdivisions across New Zealand. These dimensions would be sufficient to accommodate a typical stand-alone dwelling could be delivered on a smaller section than this. However, this generally relies on a perfectly flat site. As the standard needs to apply to residential areas more broadly it will capture sites which feature topographical constraints or geometric constraints from an irregularly shaped parent lot. Adopting a smaller minimum lot dimensions therefore creates a risk that only a very specific building design can be accommodated which would not be consistent with seeking to enable a variety of building typologies. To address this, there needs to be sufficient flexibility in the minimum vacant lot standards to enable the development of a new dwelling with undue risk of infringing development standards and creating a notification risk which can act as a barrier to development and good urban design outcomes.

An alternative approach to address the above would be to retain the 250m² site area combined with the requirement to incorporate an 8x15m building platform free from constraints and required setbacks. This would provide a degree of flexibility for future dwelling design that can be adapted to different site contexts.

It is also recommended that any minimum lot size and/ or associated dimensions standards should not apply to subdivision that is in accordance with existing or concurrently approved land use consents, or for any lots around existing buildings and development. This would help facilitate comprehensive developments and still provide opportunities to deliver more variety in typologies/ site sizes whilst conforming to a density standard.

⁸ As discussed in Section 4.2, more intensive typologies can easily be accommodated on site sizes of less than 250m². However, vacant lots do not benefit from concurrent land use/ subdivision applications so potential built form outcomes and associated quality/ amenity effects cannot be considered at the time of subdivision.

4.3 Bulk & Scale

4.3.1 Height

It is recommended to amend the permitted building heights within the MDRZ (flat and sloping sites) to align with the provisions of the MDRS (11m +1m). This better facilitates the delivery of housing intensification and the types of typologies and built form outcomes of typical medium density development in New Zealand which includes up to 3-storey walk-up apartments and narrow-lot terraced houses.

4.3.2 Sunlight Admission

In addition to an increase in height limits, the sunlight admission standards would benefit from amendments and simplification so as to not undermine any benefit from relaxing the height standard. Firstly, there is no need to create any difference between flat or sloping sites provided the standard itself is sufficiently enabling of the built form outcomes anticipated. It is recommended that these differences should be removed in their entirety. Testing indicates that both an increased height limit and more enabling sunlight admission controls on a flat site would result in less shading than existing height/ sunlight admission standards on a sloping site as per the PDP rules (refer to Figure 4 below).

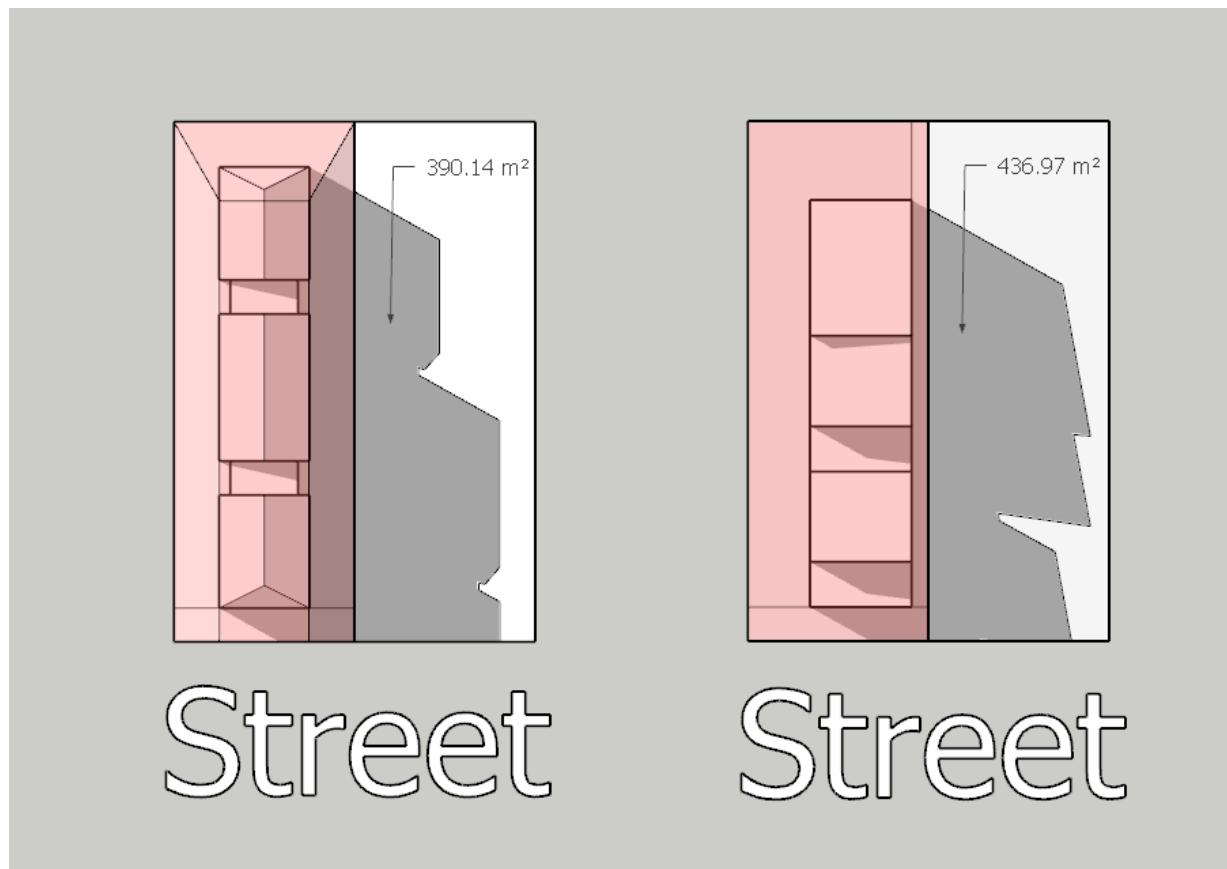


Figure 4 - Option 1 amendments on the flat site (left) vs existing standards on a sloping site (right). Model shot is taken at 3pm on 21 September with the models shown fully compliant with all standards.

In terms of the sunlight admission standard, this report has considered two alternative options which I consider are more preferable in urban design terms:

- The first option would be to adopt the 4m+60° standard the MDRS but retain a 35° sunlight admission plane from the southern boundary of any site. Exemptions to this control would apply at the boundary with roads, public open space, and business zones as well as for minor infringements relating to roof

eaves or gables. This is consistent with existing PDP provisions. The lower sunlight admission plane proposed for the southern boundary partly acknowledges Queenstown's geographic location further south than the Tier 1 authorities to which this control automatically applies (and hence lower altitude of sun during winter months) and predominantly mountainous or hilly topography (which itself generates significant additional shading in some locations) without fundamentally undermining the ability to deliver medium density typologies. Modelling indicates (refer to Figure 5 and Figure 6 overleaf) that typical medium density typologies could still be enabled on sloping sites with a more restrictive recession plane depending on its orientation.

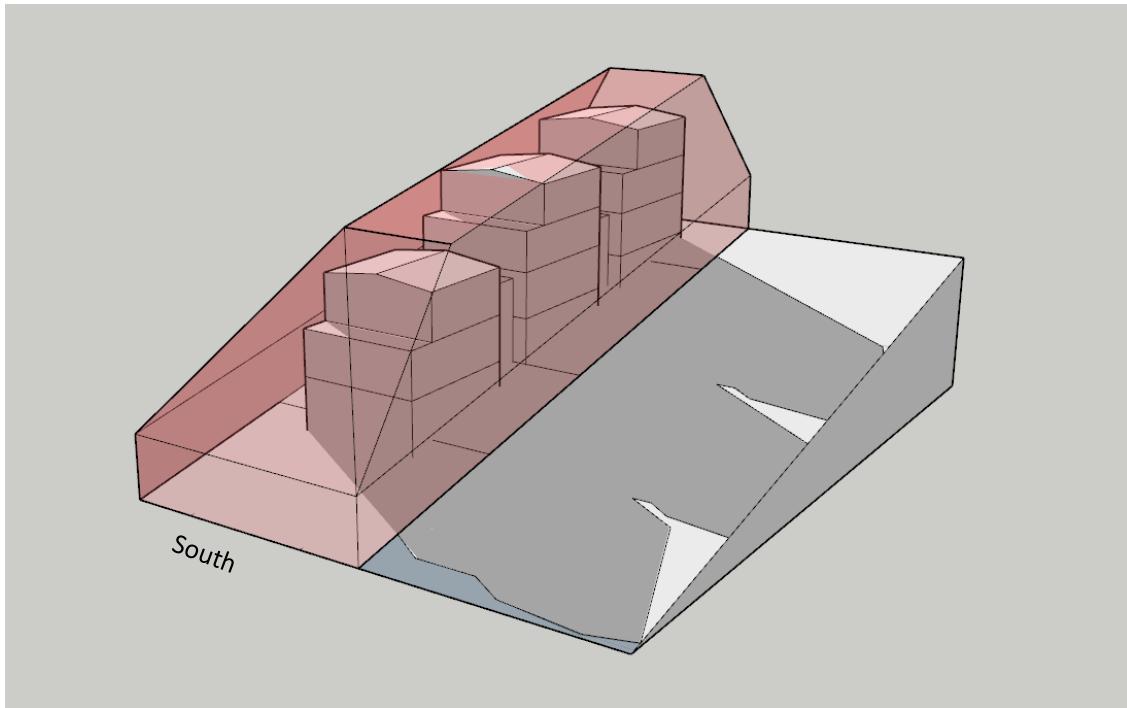


Figure 5 - Application of a 35° recession plane on the rear boundary a sloping site with an increased height limit to 11m. Model shot is taken at 3pm on 21 September with the models shown fully compliant with all standards.

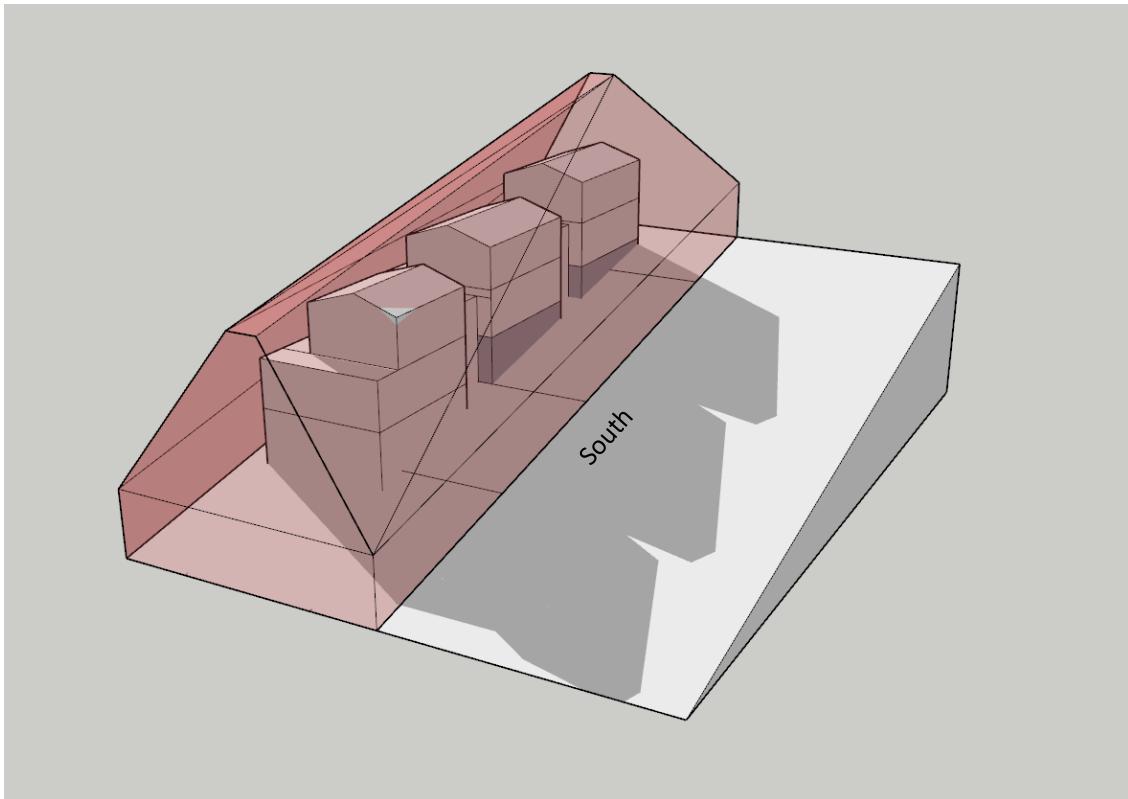


Figure 6 - Application of a 35° recession plane on the side boundary of a sloping site with an increased height limit to 11m. Model shot is taken at 3pm on 21 September with the models shown fully compliant with all standards.

- The second option would be to adopt the approach taken in the Auckland Unitary Plan which provides for an alternative control for the front portion of the site, with more restrictive controls at the rear. This option would apply the 4m+60° standard from the MDRS at front 20m of site with a 3m+45° standard applying across the balance of the site. As with Option 1, exemptions to this control would apply at the boundary with roads, public open space, and business zones as well as for minor infringements relating to roof eaves or gables. This has a benefit of encouraging a greater level of building bulk to be positioned at the front of a site where effects can largely be confined to the road corridor. It is intended to facilitate development at the frontage, provide better light and outlook for street-facing terraces, and avoid overlooking and dominance at side boundaries. A comparison between both options is provided in Figure 7 below.

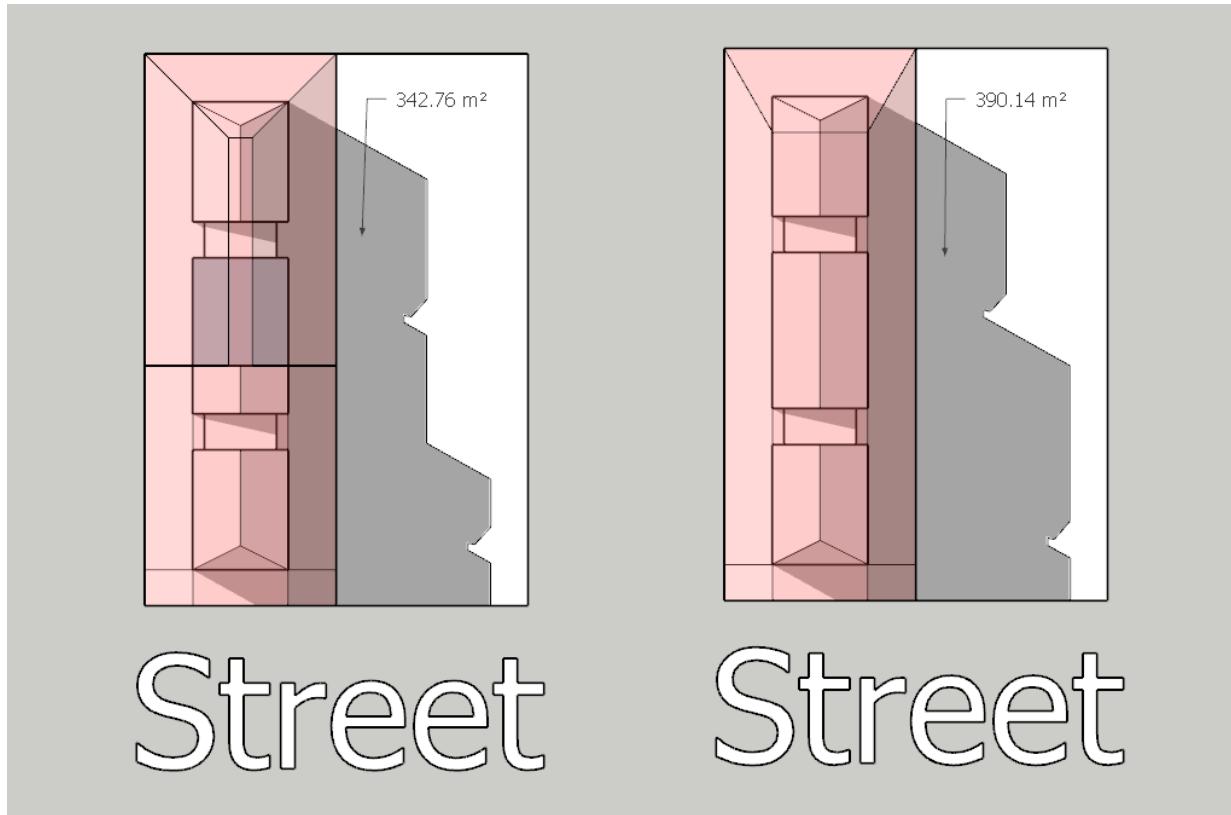


Figure 7 - Shading difference between Option 1 (right) and Option 2 (left). Model shot is taken at 3pm on 21 September with the models shown fully compliant with all standards.

4.4 Building Setbacks

Existing provisions support a road boundary setback of 3m minimum. This provides opportunities for landscaping that can support streetscape character and amenity. It would be a rational design response to maximise landscaping in this space to help meet the requirements of Rule 8.5.7. Although a narrower setback could support reasonable levels of landscaping, a 3m setback also provides further opportunities to establish larger horizontal spreading specimen trees⁹ fronting the road corridor. However, there is no associated landscaped rule to support this. It is recommended that this rule be strengthened by requiring a minimum level of landscaping in this setback. A common approach is to require at least 50% of a front yard to be landscaped with a mixture of groundcover, grasses and trees.

An additional setback of 4.5m applies to the boundaries of State Highways. As it relates to urban design, there is no justification for a greater setback from the boundary of a State Highway noting that these function as typical urban arterials at the interface of the MDRZ. Accordingly, it is recommended to remove a specific standard for setbacks from State Highways.

4.5 Outdoor Living & Outlook Space Standards

The MDRZ does not currently feature any minimum outdoor living space or outlook space standards. Based on the existing building coverage and maximum density standards such controls are unlikely to be required. However, a consequential amendment to the MDRZ in light of the recommended removal of density controls

⁹ As opposed to columnar or fastigate species that are more suitable to narrower landscaping strips adjacent to buildings.

would be to adopt the outdoor living space and outlook space standards of the MDRS. This would be beneficial in providing for an appropriate level of onsite amenity for more intensive residential uses.

4.6 Other Standards

There are a number of existing standards which are not considered to unduly restrict development of medium density typologies and help to promote positive design outcomes. This includes standards relating to maximum building length above ground floor, building coverage, garage door standards, building setbacks (excluding some road boundary setbacks), waste space and landscaped area standards.

4.6.1 Building Length

New Zealand's predominant cadastral pattern is typically characterised by sites which are longer than they are wide. This pattern can be clearly seen across the District. Longer sites in combination with narrower widths tends to generate buildings which extend a long way back from street frontages to maximise yield. This is reinforced by other development standards such as building setbacks and sunlight admission recession planes which consistently apply over the length of a site. The increased height proposed and removal of density restrictions within the MDRZ has the potential to encourage a "wall" of development running perpendicular to the street. With higher buildings and the removal of density controls, this can result in a visually dominant built form that can affect the outlook of neighbouring sites; directs outlook over adjoining sites impacting on privacy and the amenity of existing residents reducing a person's enjoyment of that space; and can create a feeling of being closed in or contained.

Whilst people living in an urban environment can reasonably expect to see others – both in neighbouring dwellings/ private open spaces and in public places – this is generally in a more transient, incidental situation (i.e. someone walking past). The revised MDRZ (combined with the predominant cadastral pattern) could promote a situation where dwellings are designed to permanently orientate over neighbouring sites. The impact of this increases with height (above ground level) in combination with the overall density of development. These issues are potentially further exacerbated in the event neighbouring sites are developed under similar circumstances.

There are a number of urban design benefits that a building length standard provides and adverse effects that it could manage. These include:

- Limits the potential for adverse visual dominance impacts resulting from the 'wall' effect that long, low and uninterrupted building elevations perpendicular to the street can have on adjoining sites;
- Potentially encourages a greater proportion of dwellings to maximise their outlook over the street and internally towards the rear, rather than over neighbouring properties to the side;
- Allows for daylight and/ or sunlight penetration into new buildings at each end enhancing internal amenity for future residents;
- Allows for improved daylight and/ or sunlight penetration through to adjoining sites;
- Could provide for opportunities to retain views through to surrounding outstanding natural landscape features and support a higher-level of on-site amenity;
- Encourages more meaningful/ functional areas of open space (private or communal) that can cater for increased on-site amenity.

4.6.2 Building Coverage

The existing MDRZ provisions allow for a total site coverage of 45%. This is generally consistent with, albeit slightly lower than, the 50% enabled by the MDRS. I support the retention of the 45% building coverage control which has to be viewed in three-dimensions with reference to permitted building height. When combined, these controls establish a building envelope/ volume. A building coverage control of 45% can help to ensure that there is a greater degree of “openness” on any given site and this helps to provide opportunities for daylight and sunlight access through and around sites depending on the configuration of built form. The benefit of this is that it provides opportunities for more substantial areas of landscaping to support on-site amenity and also better supports opportunities to retain views around building to surrounding outstanding natural landscape features which is a defining characteristic of the urban environment across the District. In turn, this could help support a higher-level of on-site amenity.

4.7 Queenstown Hill

There remain some larger sites, on the upper slopes of Queenstown Hill that are currently located within the MDRZ (refer to Figure 8). Due to the nature of the underlying topography and resultant street/ block structure, these pockets of land are relatively isolated from the Town Centre and Frankton Road (albeit proximate “as the crow flies”). As with Arthur’s Point, a consistent approach to density and zoning would be to consider adoption of the LDSRZ in this location. However, the eastern site accessed via Windsor Place represents one of the few remaining undeveloped and zoned parcels of land near Queenstown. As such, there is the potential to support a comprehensively designed scheme that can deliver higher yields of new dwellings than if the LDSRZ was to apply. As such, retention of the MDRZ is still considered appropriate in this locations. However, in light of this relatively poorer performance of these areas in terms of their accessibility, consideration could be given to adopting a lower height limit (e.g. maintenance of existing height limits). This would limit the total (permitted) plan enabled yield obtainable on these sites by restricting development to between two and three stories depending on the extent of earthworks proposed for any given development. This would ensure an efficient use of the land could still be attained whilst a design review as part of the resource consent process could help to ensure a quality-built form in what is a visually prominent area within the wider Wakatipu Basin.

4.8 Lake Hayes Estate

An existing area of recently developed residential land within the Lake Hayes Estate centred around Red Cottage Drive currently falls within the MDRZ and was developed as a Special Housing Area. This area has been developed at a more intensive suburban scale, with one-to-two storey detached dwellings, which is more consistent with the overall built form outcomes of LDSRZ. The accessibility analysis identifies this area as performing relatively poorly, especially compared with areas west of the Shotover River. Consideration could be given to a change to the adjacent LDSRZ in this area to ensure a spatially consistent application of different residential zones/ densities. However, as this area has been recently developed retention of the existing MDRZ (with modification) or application of the LDSRZ is likely to represent a largely academic exercise.

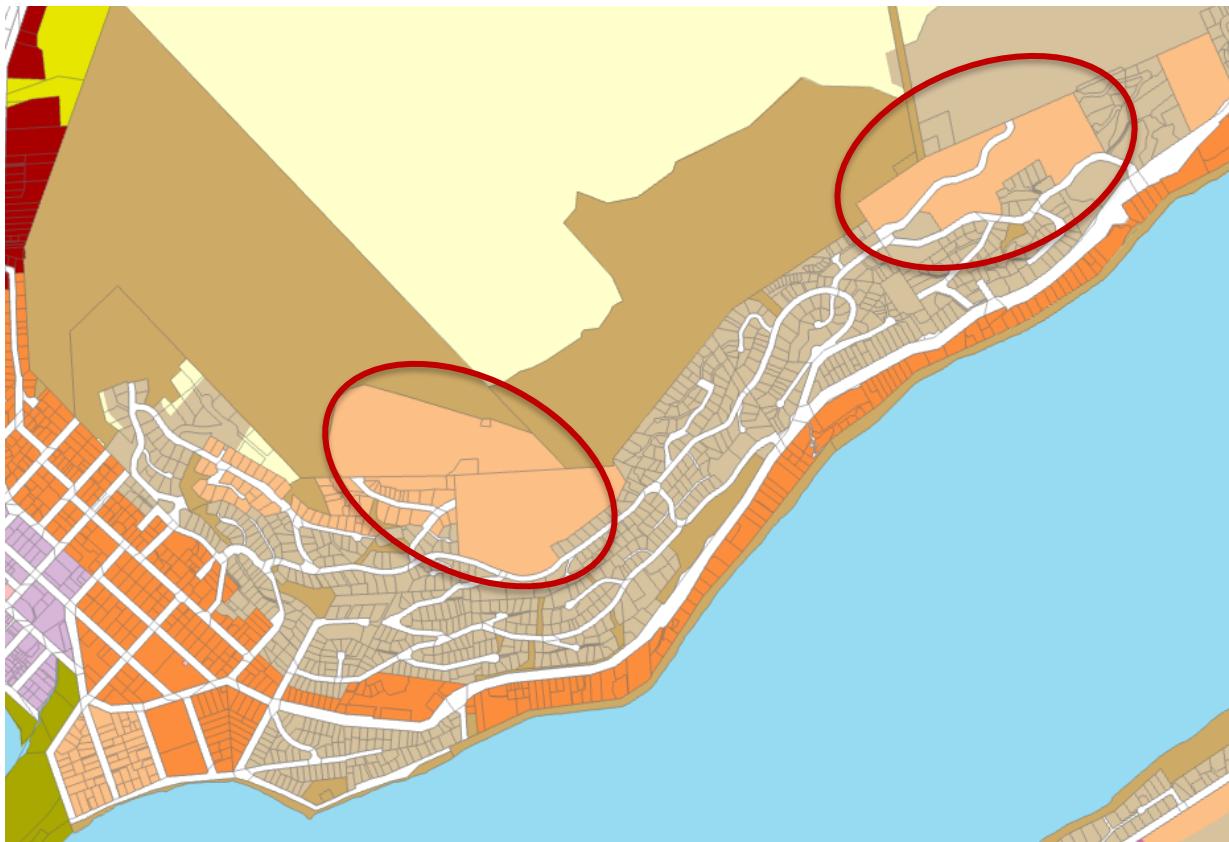


Figure 8 - Potential areas to consider for rezoning to LDSRZ or applying bespoke height controls to reflect reduced accessibility (circled red).

4.9 Arthur's Point

Small pockets of MDRZ are currently provided for in Arthur's Point and are associated with tourism/ visitor accommodation uses. If you were to take a consistent approach to accessibility across Queenstown Lakes it could be appropriate to consider applying the LDSRZ in this location. However, the use of the MDRZ has been applied to address the unique contextual situation of Arthur's Point in terms of its function within the wider tourism industry of Queenstown Lakes. As such, there are no concerns in urban design terms with retaining the MDRZ in this location. In light of the area's poorer accessibility, retention of the existing height limits under the PDP in a similar manner discussed in Section 4.7 above could still be utilised.

4.10 Wānaka

Two existing pockets of recently developed residential areas north of Wānaka Town Centre and near Mt Aspiring College currently fall within the MDRZ (refer to Figure 9). These areas have been developed at a more suburban scale, single-storey and detached dwellings, which is more consistent with the LDSRZ. The accessibility analysis identifies these areas as performing relatively poorly, especially compared with areas immediately around the Town Centre. Consideration could be given to a change to the adjacent LDSRZ in these areas to ensure a spatially consistent application of different residential zones/ densities. However, as these areas have been recently developed retention of the existing MDRZ (with modification) or application of the LDSRZ is likely to represent a largely academic exercise.

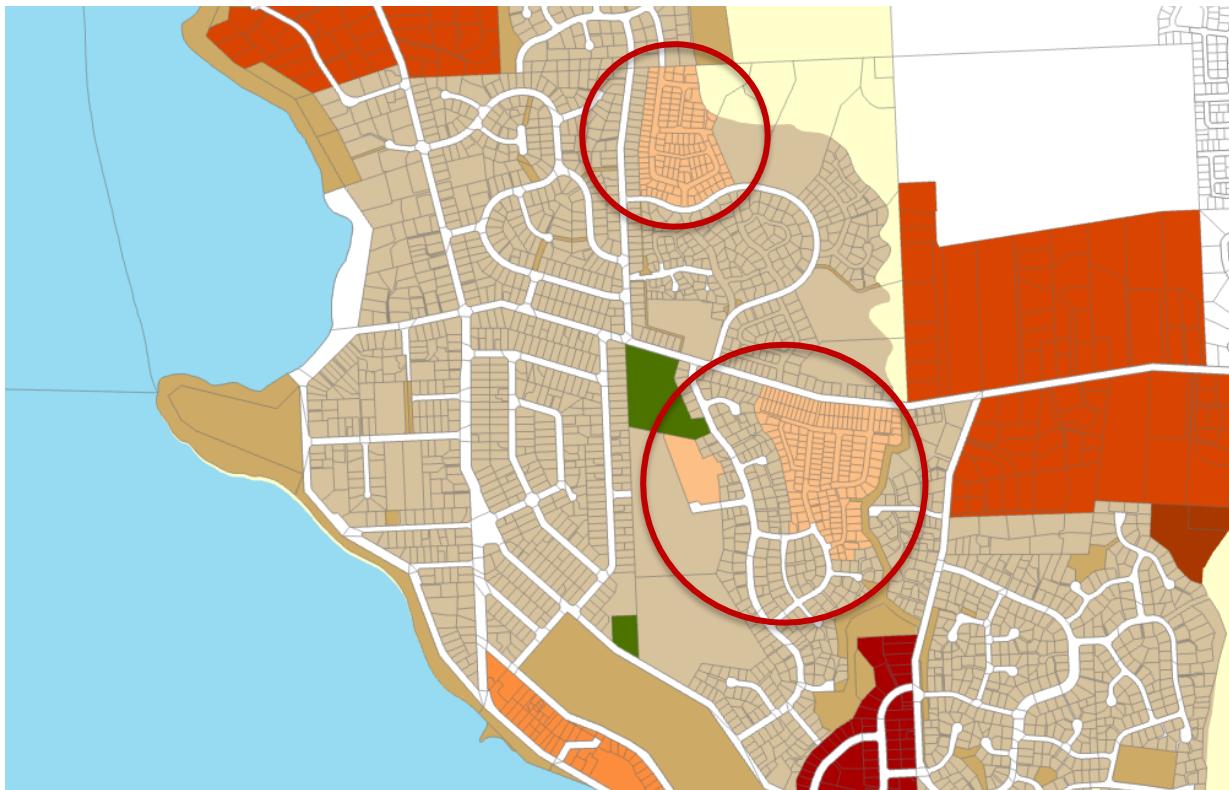


Figure 9 - Potential areas to consider for rezoning to LDSRZ (circled red).

4.11 Objectives & Policies

In addition to the above recommendations, changes would likely be required to the policy framework of the MDRZ. Of particular relevance to urban design matters, I consider the following changes would be beneficial to support an amended suite of built form standards within the MDRZ:

- Amend objective 8.2.1 and policies 8.2.1.1 and 8.2.1.3 to refer to enabling/ locating medium density development in areas with good¹⁰ accessibility and/ or demand.
- Amend Policy 8.2.1.4 to enable “apartment” housing. Policy 1 of the MDRZ provides a similar alternative.
- Amend objective 8.2.3 and policies 8.2.3.1 and 8.2.3.2 to remove reference to “maintenance of amenity values”. The focus should instead be on design outcomes you could be seeking to enable on neighbouring sites (e.g. “provide opportunities for sunlight ...”)

¹⁰ The comparable objectives/ policies for a High Density Residential Zone would refer to “high” accessibility or demand to help establish a clear hierarchy.

5.0 High Density Residential Zone

5.1 Review

The National Planning Standards define a High Density Residential Zone (**HDRZ**) as “areas used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities.” This provides a clear contrast with the MDRZ with an expectation of mid-rise to high-rise typologies being enabled.

The objectives and policies are generally well aligned with enabling denser types of development. However, on balance, the standards are still quite restrictive and are not considered enabling of the higher densities envisioned by the zone framework or national policy direction. The exception to this is on sloping sites where the lack of any recession plane allows for significantly more development than on flat sites which are themselves subject to recession planes which are more closely aligned with low-density suburban areas of New Zealand. The effect of this is to make development more restrictive on flat sites which have a benefit of being easier/ cheaper to develop. This results in a significantly different effects envelope being enabled on sites adjacent to a site identified as sloping. In this regard, there seems to be an acknowledgment that a reduction in existing amenity values is considered appropriate if it is required to enable development anticipated by the zone provisions. The varied height controls for Wānaka also limit the potential for high density housing and are more aligned with medium density or even smaller scale suburban housing with a height limit of two-storeys.

The S42A report for the HDRZ, indicates that this differentiation was largely driven by the proposed controls being quite restrictive in the first place. In addition, the activity status for infringements also adds to the restrictiveness of the standards. Further, in my experience, development standards are often (mistakenly) interpreted as “bottom lines” which must be complied with, with any infringements generating adverse effects that must be addressed rather than as triggers for further or more detailed assessment. For these reasons, it is not uncommon for applicants to seek to conform with key development standards controlling bulk and location which means that these could be acting as a barrier to supporting intensification for all but the most well-resourced applicant.

5.2 Bulk & Scale

5.2.1 Height

Existing permitted heights in the HDRZ are generally limited to 12m which is comparable to the height limit of the MDRS (11m +1m). There are some exceptions to this with up to 15m and 20m enabled in some locations and subject to a more onerous resource consent status.

Generally speaking, the cost of construction greater than three storeys in New Zealand increases significantly due to structural engineering, circulation and fire standards. This also creates challenges with securing and servicing funding to enable more intensive development to occur.¹¹ These factors, combined with higher levels of accessibility in and around Queenstown Town Centre in particular mean that a higher permitted building height would be appropriate to assist in recouping the additional costs associated with more intensive building typologies. To help address the above issues, an increase in building height up to 16.5m is considered appropriate in the local context – enabling building up to five storeys in height. This will provide a transition in

¹¹ Alternative housing models such as build-to-rent or community housing, as well as emerging construction technologies like light-weight structural timber may improve the feasibility of more intensive housing developments.

scale between the increased heights proposed in commercial zones (refer to Section 6.0 of this report) with the MDRZ and also provide an incentive for the development community over and above the MDRZ to support greater levels of intensification in areas with high levels of accessibility to a range of commercial and community amenities.

In determining an appropriate height in metres equivalent to a five-storey residential building, a 16.5m height limit is proposed. As with the MDRZ, it is not considered necessary for any distinction between flat and sloping sites is warranted provided the package of standards is appropriately enabling. This would enable five storeys with a floor-to-floor height of 3.1m (this would enable an internal floor-to-ceiling height of approximately 2.7m) and totalling 15.5m.¹² An additional allowance of 1m has also been included to accommodate sloping roof forms.¹³

5.2.2 Sunlight Admission

Compliance with the MDRS sunlight admission standard or that of the PDP is unlikely to deliver the expected higher intensity residential development anticipated in the HDRZ. The existing provisions (2.5m + 45°) as applied to flat sites are typical with controls seen in low density residential zones across New Zealand and are designed to enable predominantly single storey, detached typologies. Without significant infringements, they also promote a “wedding cake” built form response which can be both inefficient and visually unattractive. In order to achieve a development of the size and scale generally anticipated for the HDRZ, there is a need for a more enabling sunlight admission standard that works in concert with increased permitted height limits. Consistent with my recommendations for the MDRZ, it is not considered necessary for any difference between flat or sloping sites is required provided the standard itself is sufficiently enabling of the built form outcomes anticipated and that these should be removed in their entirety.

Apartment buildings (and to a lesser degree terraced housing development) typically require a large, flat floor plate at each level so that multiple units at each level share a stair landing and potentially a lift lobby. Taking into account typical 1-bedroom apartment unit sizes of 45m², it would not be unreasonable to assume a floor plate of at least 260m² (roughly 12m wide by 22m deep). If sunlight admission angles are set too restrictively it can limit the viability of achievable floorplates at upper levels, effectively acting as a *de facto* height limit across the entire site.

As such, it is recommended that the sunlight admission angles are amended to 8m+60° from all boundaries excluding road boundaries¹⁴ and southern site boundary across the entire HDRZ. As with the MDRZ, exemptions to these controls should apply along the boundary with roads, public open space and business zones. Minor exemptions should also apply to roof eaves and gables. An 8m+45° standard could be sought along the southern boundary of a site consistent with the approach recommended within the MDRZ. These should apply to both flat and sloping sites. This would enable buildings up to 11.5m in height to be built without infringing the recession plane (assuming compliance with the 2m building setback). The full 16.5m building height would be achievable within 4.9m¹⁵ of a side boundary and will help ensure viable floorplates (7m wide) can be delivered on sites as narrow as 17m.

¹² 3m is generally regarded as the absolute minimum required to ensure sufficient internal floor-to-ceiling heights. Apartment schemes typically feature floor-to-floor heights of 3.1-3.2m while higher end developments can include floor-to-floor heights of up to 3.4m.

¹³ Flat roofs still require a pitch of 3% - across a 12m wide building this equates to additional roof height of 0.75m.

¹⁴ No sunlight admission angle should apply from the road boundary consistent with the MDRS.

¹⁵ This would increase to 8.5m along the southern boundary with the application of a 45° recession plane.

The proposed sunlight admission recession plane is still modest compared with other approaches to other HDRZ's in New Zealand.¹⁶ As building heights are increased above the three to four storeys currently enabled, a potential risk of the space between buildings being excessively enclosed might emerge. The proposed recession plane in combination with a proposed outlook standard allow some sunlight into these spaces between buildings. The impact of the proposed increased height limit and amendments to the sunlight admission control is shown in Figure 10 below. This demonstrates that there is minimal additional theoretical shading that would be generated throughout the majority of the day during the spring equinox. It should be noted that the below provides a representative scenario for the year (displaying shading during the spring equinox¹⁷) as existing buildings, fencing and vegetation as well as shading from surround mountains will all have various impacts in a real-world situation.

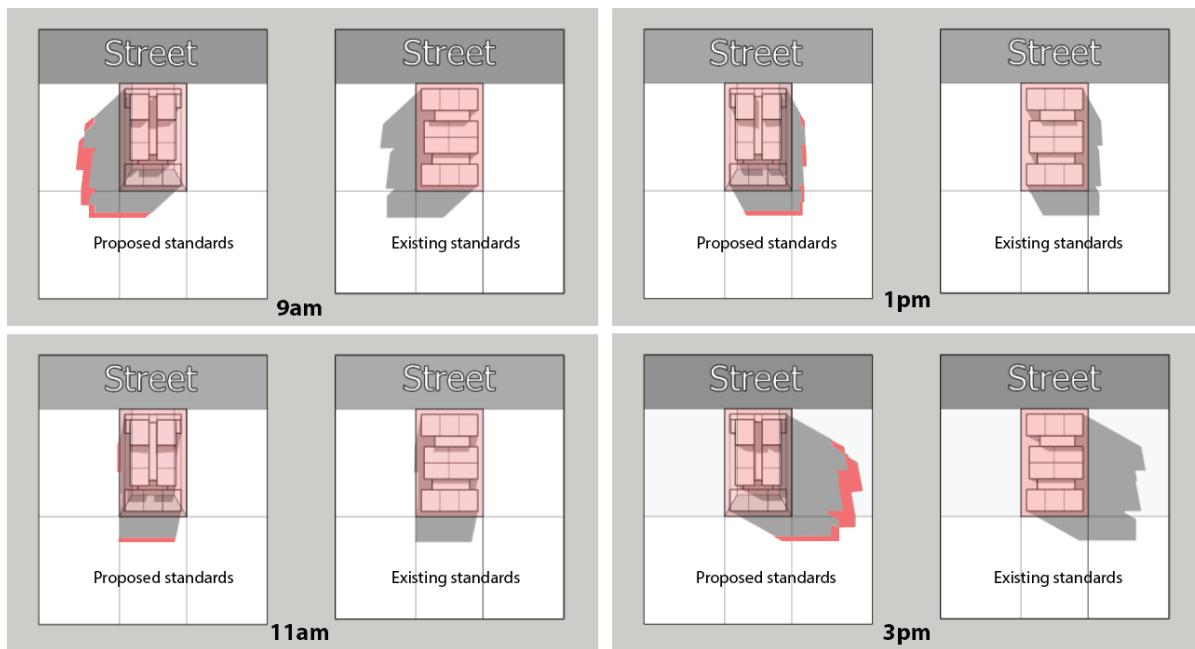


Figure 10 - Shading difference between proposed HDRZ standard and existing HDRZ standards on a sloping site (red indicates additional shading). Model date of 21 September.

An alternative approach to the sunlight admission recession plane would be to adopt the same standard as the MDRZ ($4m+60^{\circ}$) and just rely on the increased height and building coverage as a key differentiator between the MDRZ and HDRZ. This would have the practical effect of limiting development up to the 16.5m height limit to sites of at least 22m in width. A large portion of parcels within the existing and recommended HDRZ (where infill development has not previously occurred) feature lot widths of between 15m and 21m. A more restrictive sunlight admission angle in line with the MDRZ would therefore place a high reliance on site amalgamation to achieve anticipated built form outcomes and realise the intensification benefits sought by the HDRZ. As such, a more enabling $8m+60^{\circ}$ standard is considered more appropriate.

¹⁶ For example, Auckland Council has proposed a recession plane of $19m+60^{\circ}$ to apply in their THAB Zone as part of Plan Change 78.

¹⁷ The equinox is considered an appropriate time to consider potential effects noting it falls half-way between the best case (summer solstice) and worst case (winter solstice) scenarios and is therefore more representative of potential effects that could be experienced over the majority of the year.

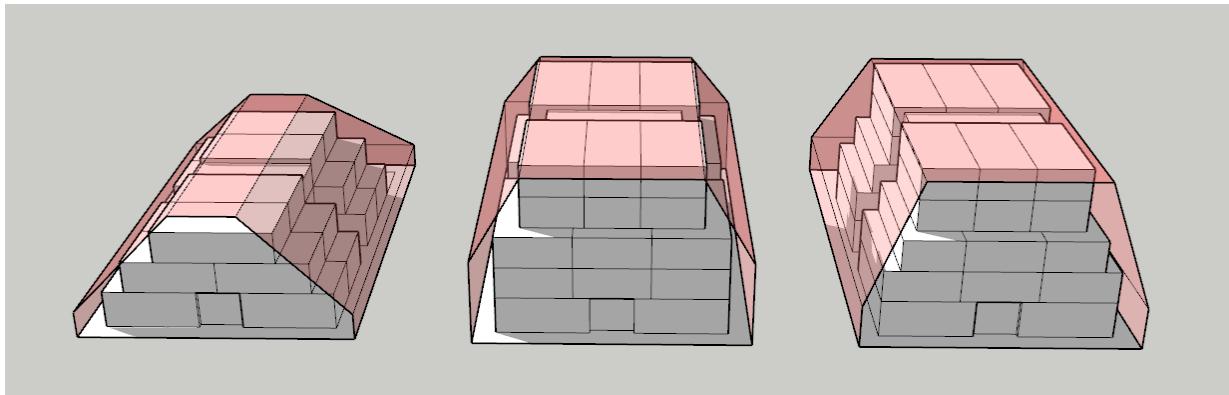


Figure 11 - Potential building envelopes for building height and sunlight admission controls for existing HDRZ (left), recommended option (middle), and alternative option (right).

5.3 Bespoke Provisions

There are a number of bespoke height provisions relating to parts of the HDRZ in areas like Kawarau Falls Bridge, below State Highway 6 (SH6) in Frankton and Frankton North. More onerous standards limiting height within the HDRZ to between 7 and 8m also apply in Wānaka.

5.3.1 Kawarau Falls

The retention of building height restrictions within the HDRZ for sites below SH6 and adjacent to Kawarau Falls Bridge remains appropriate under the policy direction of the NPS-UD and taking into account the results of the accessibility and demand analysis. This area clearly does not perform as well as other areas closer to Queenstown and Wānaka town centres and it is understood that the vistas from SH6/ Frankton Road south towards Lake Wakatipu, Kelvin Heights and Cecil Peak are valued by the local community. It is recommended that this area is incorporated into a revised MDRZ and note that this would still provide for a similar/ slightly increase in development potential for these areas. This would also have the benefit of a more coherent zoning strategy/ planning approach consistent with the outcomes of the accessibility and demand analysis and national policy direction. An alternative option would be to adopt the status quo approach and retain the HDRZ whilst applying bespoke height controls noting that the key driver for development in this area may be related to the needs of visitor accommodation rather than purely aligned with the accessibility requirements of the NPS-UD.

5.3.2 Wānaka

With regards to the HDRZ in Wānaka, with modifications proposed to the MDRZ there is a potential that development in the existing HDRZ would be less enabling. Based on the location of the HDRZ near the town centre and in Three Parks, there would ideally be amendments to ensure the heights and density of development in these areas is commensurate with their location within the wider urban structure. As such, heights in these areas should be increased to levels no less than that proposed for the MDRZ. Given the location of the HDRZ in Wānaka, and its overall role as a smaller order centre within the District with lower levels of accessibility when compared with Queenstown (albeit still better than many other parts of the urban environment), it could also be beneficial to treat the HDRZ distinct from that elsewhere in the District. This would help reinforce Queenstown as the primary urban centre across the District whilst still enabling greater levels of intensification in and around Wānaka.

5.3.3 Arthurs Point

The application of the HDRZ in Arthurs Point appears to be provided to support the development of visitor/tourist accommodation rather than typical residential uses. As such, there are no fundamental concerns in urban design terms with retaining the HDRZ in this location given this context. However, it is noted that the accessibility analysis identified that Arthurs Point performed relatively poorly in terms of accessibility within the wider urban environment. This is not surprising as there are limited local amenities and a single, infrequent bus service providing links between Queenstown and Arrowtown. As such, retaining the focus on visitor accommodation in this area of HDRZ is an important distinction that should be retained.

5.3.4 Frankton North

In terms of height standards relating to Frankton North area, a restricted-discretionary consent can be sought for heights up to 20m whereas up to 12m is a permitted activity. Development over 20m triggers a non-complying activity status where a discretionary status is applied elsewhere. At a minimum, it is recommended to increase the 12m height standard to 16.5m for consistency across the HDRZ.

I note that this is currently a greenfield environment. As such, buildings over 20m are unlikely to generate comparable level of effects on neighbouring sites (as these do not yet exist) and there is therefore an opportunity to signal a slightly more enabling consenting pathway for height infringements in this location. Many of the issues which may be relevant when considering intensification such as impacts on existing residents therefore do not currently apply. As such, it is recommended that removing the non-complying component for development which infringes the 20m height limit would be appropriate so as to not foreclose on a more efficient use of this land and provide greater design flexibility in this area as this may result in better overall design outcomes. As set out in section 5.2.2, apartment typologies often rely on larger floorplates which reduces some ability to accommodate slope changes in an efficient building design. It is highly likely that there may be situations where minor infringements are appropriate or necessary to accommodate anticipated building forms.

5.4 Building Setbacks

Existing provisions support a road boundary setback of 2m minimum. This provides opportunities for landscaping that can support streetscape character and amenity. An additional setback of 4.5m applies to the boundaries of State Highways. In urban design terms, there is no justification for a greater setback from the boundary of a State Highway noting that these function as typical urban arterials at the interface of the HDRZ.

I recommend removing a specific standard for setbacks from State Highways and reducing the setback from road boundaries from 2m to 1.5m (consistent with the MDRS). This helps to provide a subtle variation in the residential zone framework (as opposed to the 3m required in the MDRZ) and expressly acknowledges a more “urban” character and expectation for development within the HDRZ and will help provide a transition in building form into commercial zones assisting with legibility of urban areas.

5.4.1 Building Setback at Upper Floors

An additional control which could be considered to address values identified by the community and potential concerns over enabling a greater density/ height of development could be through the introduction of a “building setback at upper floors” control. A simple control would be to apply a 2m setback above 10m/ 3-storeys from the corresponding yard setback (i.e. a building at upper levels would not require a further setback if already built 2m or beyond from the yard setback such as shown in Figure 12 overleaf). This standard would work in concert with the recommended recession planes (i.e. it would not impose additional standards on top of recession planes applying from side/ rear boundaries).

The purpose of this would be to provide for some additional daylight/ sunlight opportunities onto the street and neighbouring sites and to help to reduce the visual impact of the additional height enabled noting that the HDRZ also contains a high building coverage allowance which differentiates it from many other high density residential zones in New Zealand. This would keep the bulkiest part of the building at a lower scaled 3-storeys. Similar provisions existing in the Auckland Unitary Plan and apply to development within business and mixed-use zones which enabled much higher levels of building coverage and defined setbacks are a common architectural approach to reduce the perceived size of a development. A comparable example already undertaken in Queenstown is the Ramada development on Stanley Street which employed an upper storey setback above the fourth storey.

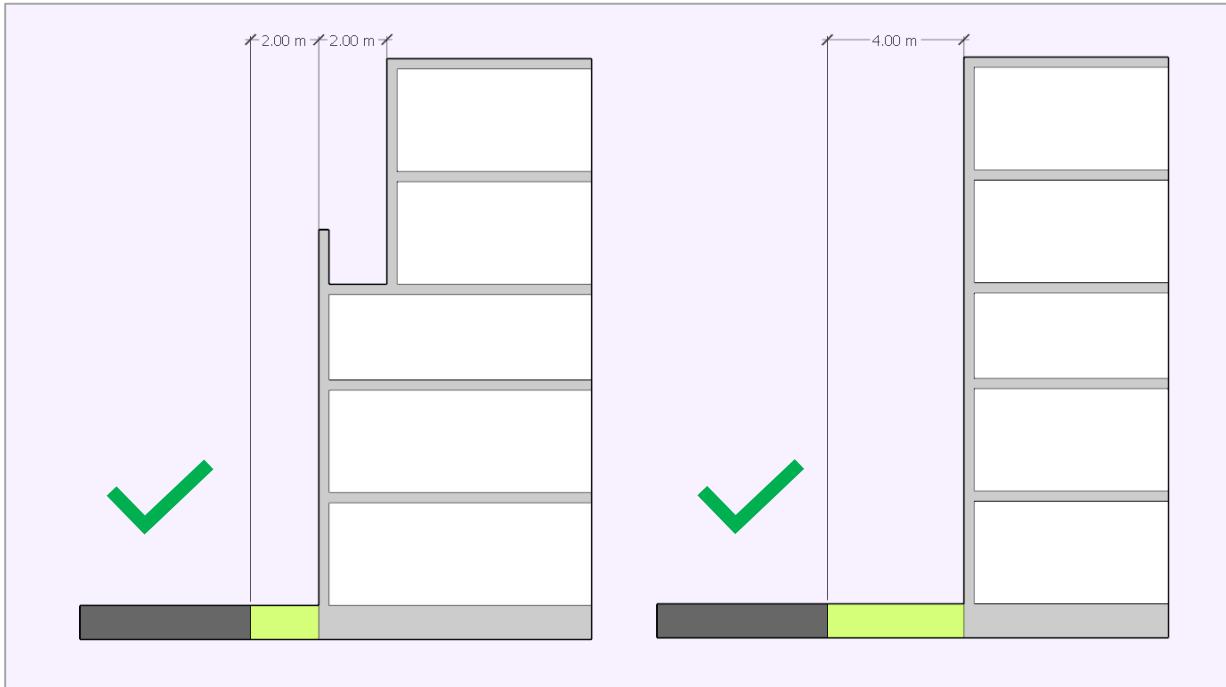


Figure 12 – Differing application of potential upper-storey setback within the HDRZ. The building on the right can utilise a greater front yard setback in lieu of the upper-storey setback.

5.5 Waste and Recycling Storage Space

The PDP currently requires a minimum waste and recycling storage area of 2m² for each residential dwelling within the HDRZ. Waste and recycling are an important consideration for any higher density development, however there are a range of ways this can be accommodated such as individual bins for units to larger communal bins collected via a private company. Communal options would also likely deliver much more space efficient options in an apartment building. As such, it would be more appropriate for a specific standard around waste storage to be removed. Instead, this would be better addressed as part of overall design assessment of a development. This could be done through matters of discretion or assessment criteria. An example criterion could be worded as:

“the extent to which the necessary waste collection and recycling facilities are provided in locations conveniently accessible for occupants.”

This potentially removes an additional matter of consent which is not well aligned with the practical realities of more intensive housing development.

5.6 Outdoor Living & Outlook Space Standards

The HDRZ does not currently feature any minimum outdoor living space or outlook space standards. However, a consequential amendment to the HDRZ in light of the recommended increase in height and relaxation of sunlight admission standards would be to adopt the outlook space standards of the MDRS. This would be beneficial in providing for an appropriate level of onsite amenity for more intensive residential uses and ensuring some degree of separation for dwelling not orientated towards the street or other public open spaces.

With regard to outdoor living space standards, in recognition of the zone being located in areas with high levels of accessibility it is considered that retention of no minimum outdoor living space standard is appropriate. In the majority of instances, sites within the HDRZ have proximate access to public open spaces which can help fulfil this role. It is also noted that this provides increased flexibility in terms of housing typologies provided and further differentiates the HDRZ from the MDRZ.

5.6.1 Other Standards

There are a number of other existing standards which are not considered unduly restrict development of high density typologies and help to promote positive design outcomes. This includes standards relating to maximum building length above ground floor¹⁸, building coverage, garage door standards, building setbacks (side and rear boundaries) and landscaped area standards.

5.6.2 Subdivision

The above would also require amendments to related standards within Chapter 27 – Subdivision and Development.

As with recommendations for the MDRZ, subdivision standards around minimum sizes and dimensions should not apply to subdivision that is in accordance with existing or concurrently approved land use consents. In these instances, the adequacy of site sizes and dimensions can be considered in the context of a proposed building and could otherwise give rise to unnecessary consent triggers which serve no practical benefit from a design perspective.

In terms of minimum site areas, the PDP currently requires a 450m² site area combined with dimensions of at least 15m x 15m. This provides a degree of flexibility for future dwelling design. However, consideration should be given to increasing the minimum lot dimensions for vacant lot subdivision within the HDRZ. This is an approach that has been adopted in the Auckland Unitary Plan¹⁹ and seeks to avoid an issue where vacant lot subdivision could foreclose on future intensification opportunities that could be achieved through more intensive building typologies such as apartments. An increase to 20m x 20m and a minimum site area of 600m² could better support enabled building forms within a revised HDRZ in the event of a vacant lot subdivision.

Adopting smaller minimum dimensions could create a constrained building platform therefore creating a risk that only a very specific building design can be accommodated that does not maximise potential of the zone. As such, there needs to be sufficient flexibility in the minimum vacant lot standards to enable the development of a new dwelling with undue risk of infringing development standards and creating a notification risk which can act as a barrier to development and good urban design outcomes.

¹⁸ Refer to rationale in Section 4.6.1.

¹⁹ Rule E38.8.1.1(2).

5.7 Consequential Changes

Increased building heights and density of development recommended within the HDRZ would give rise to a number of consequential amendments to various HDRZ provisions. These include:

- (a) Matter of discretion 9.4.5(b) should be amended to remove reference to “sunlight” as this matter should be limited to assessing potential infringements to building height or recession planes – rather than buildings generally enabled/ planned for;
- (b) An additional matter of discretion addressing on-site amenity for future residents to better enable consideration of the functionality of units/ orientation/ outlook etc. 8.7(c)(i)-(iv) of the Draft Te Putahi Ladies Mile Planning Provisions provides a good basis for this and could also replace 9.4.5(d) and 9.4.5(e);
- (c) The Residential Design Guide should be amended to remove any reference to specific provisions/ standards (e.g. building height), and instead focused on good design principles only.

5.8 Objectives & Policies

In addition to the above recommendations, changes would likely be required to the policy framework of the HDRZ. Of particular relevance to urban design matters, I consider the following changes would be beneficial to support an amended suite of built form standards:

- (a) Amend objective 9.2.1 to refer to areas of “high accessibility” and “demand. E.g: High density housing development occurs in urban areas close to town centres with high accessibility, to provide greater housing diversity and respond to expected population growth and demand for housing.
- (b) Amend objective 9.2.3 and policies 9.2.3.1 and 9.2.3.2 to remove reference to “maintenance of amenity values” which has the potential to actively hinder the types of built form outcomes anticipated within a high density residential area. The focus should instead be on design outcomes you could be seeking to enable on neighbouring sites (e.g. “provide opportunities for sunlight ...”)

6.0 Queenstown Town Centre Zone

6.1 Review

The PDP provisions manage urban design issues through a highly complex mix of development standards and assessment matters as well as special carve-outs for individual sites which had their genesis within the Operative District Plan. These are comprehensive but it is considered that they require amendment to reflect the new policy focus of the NPS-UD (as it relates to design and built-form) on the quality and functionality of the future built environment as well as the amenity benefits of enabling people to live in areas of high accessibility, rather than the maintenance of the existing lower scale character of the town centre.

Existing provisions are based on a fine-grained approach around streets, public open spaces and the scale of existing development (regardless of age). With a particular focus on sunlight during the middle of the day around mid-winter. Whilst sunlight (and the amenity that can be derived from it) remains relevant, the approach is considered very restrictive and sets the maximum level of development based on periods with the minimum amount of potential sunlight across all areas of public open space and streets. In addition, high-level shading analysis indicates that existing topographical features around the town centre already cast extensive shadows across the town centre throughout various periods of the day (especially during winter).

6.2 Bulk & Scale

6.2.1 Heritage Precinct

There are a number of scheduled historic heritage items within Queenstown Town Centre. The majority of these are concentrated within a Historic Heritage Precinct which is centred along Ballarat Street. A wider area between Camp Street and the lakefront forms part of a “Special Character Area”.

From an urban design perspective, the utilisation of Historic Heritage as a qualifying matter that can limit the height and density of development within Queenstown Town Centre is appropriate in urban design terms. I also support the retention of controls on sites in the immediate proximity of these listed buildings so as to avoid a situation where new development is of a scale that dominates or detracts from those historic heritage values. I note that the existing provisions generally provide opportunities for the potential of an additional storey of development adjacent to heritage buildings. This would remain be an appropriate design response to the context and recognised heritage characteristics of specified building and heritage “core” of the Town Centre.

As such, I believe there is value in retaining the low-rise characteristic of the Historic Heritage Area. From an urban form perspective, I believe this should also cover the block bounded by Church, Earl and Camp Streets which also contains a number of scheduled heritage items.

Based on the above, I would recommend:

- Maintaining a maximum building height of 8m in the existing block bounded by Beach Street and Rees Street to protect heritage values as well as support appropriate levels of sunlight access to Earnslaw Park and the lakefront area.
- Maintaining the maximum building heights for sites within the Historic Heritage area (including sites fronting Ballarat Street north of Camp Street) and the block bounded by Church Street/ Earl Street.

6.2.2 Special Character Area Precinct

The Special Character Area captures a broad part of the Town Centre around the periphery of and including the historic core (as discussed in section 6.2.1 above). The PDP requires development in the Special Character Area to be consistent with the design outcomes sought by the Queenstown Town Centre Design Guidelines 2015.

The existing characteristics of the Special Character Area are a diverse collection of architectural styles and ages of buildings combined with a relatively low density of 2-3 storeys. There are some pockets of increased density provided with buildings up to 4-storeys although this appears to be achieved through low floor-floor heights. This is not dissimilar from many other town centres throughout Regional New Zealand. As the main purpose of the NPS-UD and PRPS is to enable greater density in urban environments, the existing nature of low-density commercial development within the Special Character Area²⁰ does not justify preventing a higher density of development in the future by constraining building heights.

Accessibility mapping has, unsurprisingly, identified that Queenstown Town Centre performs very well compared to all other urban areas in terms of access to a range of commercial and community services. From an urban design perspective, the existing nature of urban development should not undermine the benefits of

²⁰ Excluding the historic core discussed in Section 6.2.1.

further intensification in and around Queenstown Town Centre. As such, I do not believe there are any “special character” grounds that would justify blanket restrictions in building height.

6.2.3 Viewshafts

Height Precinct 7 features two view shafts (C and D) which limit height. The purpose of these, as set out in Tim Church’s urban design evidence are to provide visual connections from Man Street towards the town centre and vice-versa towards Ben Lomond. In addition, they are intended to visually break up future development in what is a large parcel/ block which sits in a visually prominent spot at a higher elevation than the remainder of the town centre. I have been unable to ascertain the rationale for the specific location/ orientation of these view shafts, rather they appear to offer a generic visual connection to surrounding landscapes rather than specific landmarks (built or natural).

From an urban design perspective, the desire to break down larger buildings to avoid a potentially visually dominant “wall” type development is supported. However, this outcome can be better accomplished via a standard design review (resource consent/ urban design panel). In terms of providing visual connections, Height Precinct 7 is approximately 166m in length, with extended viewshafts already enabled along both Hay Street and Brecon Street corridors at either end of the block. These are, naturally, aligned with the key physical connections that provide access through to the remainder of the town centre. In contrast, Viewshafts D and C do not appear to assist legibility/ wayfinding (both physically and visually) in any meaningful way. The scale of existing development on Shotover Street and Beach Street also means that they would have limited benefit when looking back toward Ben Lomond. As such, it is considered that these have limited value from an urban design perspective when weighed up with the potential lost development opportunities through a more constrained design response in an area of high accessibility.

6.2.4 Recommendations

An analysis of accessibility and demand highlights that Queenstown Town Centre has the highest levels of accessibility across the District. The area also performs well in terms of relative demand. As such, an increase over and above existing levels of development is considered warranted.

In determining what appropriate heights/ densities would be for the area we have reviewed recent consent decisions in the surrounding environment, the Spatial Plan as well as the suite of documents prepared as part of PC50. These generally seek to enable development over and above the maximum 14m generally signalled for much of the Town Centre with PC50 enabling heights of up to 24m. As such, this provides a reliable basis for what the development community could expect to deliver. Applied more broadly than PC50, a height limit of 24m would also clearly signal Queenstown Town Centre as the “highest order” centre across the District whilst remaining firmly in a “mid-rise” / human-scaled height range.

Height limits of up to 6-storeys/24m²¹ should be concentrated in blocks adjacent to Stanley and Shotover Streets away from the historic core and key public open space. Building heights should then transition down from this in surrounding blocks to recognise a slight reduction in accessibility, provide an appropriate interface with the historic core of the town centre and surrounding residential uses, and retain an appropriate level of sunlight in key open spaces of the Village Green, Earnslaw Park, Marine Parade and the grounds of St Peter’s Anglican Church. Transitional heights of up to 5-storeys/ 20m are recommended adjacent to the historic core and southwards along Beach/ Shotover Streets. These height limits are shown in

²¹ Floor heights within a commercial zone have been based on a floor-to-floor height of 4m as opposed to 3.1m in residential zones. A greater floor height is generally required for commercial uses as they typically have increased service requirements over residential uses. In this context, a mixed-use development with upper levels in residential uses could achieve approximately 7-storeys within the 24m height limit



Figure 14 overleaf. The approach to height would help maintain an “amphitheatre” type configuration of development in and around the Town Centre with height increases as one moves away from Marine Parade, in turn working with the topography as it rises towards Queenstown Hill and Ben Lamond helping to reflect, in principle, existing patterns of development.

In addition to the height limits, it is recommended to remove the various recession planes which apply above street level and to instead include a specified building setback of 6m. This could apply above 12m in building height across much of the Town Centre Zone and 8m around the Historic Core (where a 4m setback would apply). This approach has a number of benefits including:

- New development as viewed from the street would retain the predominant “low-scale” 3 to 4 storey character as viewed from its immediate surrounding which is prevalent across the town centre;
- A set-back of 6m as viewed from the street could effectively “hide” around 2 additional storeys of development enabled from the increased heights. An existing example of where this can be observed is the Mountaineer development at the corner of Beach and Rees Street or in Figure ;
- It provides opportunities for upper-level balconies/ communal open spaces that could benefit from access to increased levels of sunlight from their elevated position; and
- Where applicable, maintains a degree of sunlight access to key open spaces and often works in addition to building setbacks created from street corridors.

Such an approach can be seen in the centre zones of the Auckland Unitary Plan.²² The stated purpose of this rule is to:

- *provide adequate daylight access to streets;*
- *manage visual dominance effects on streets;*
- *manage visual dominance, residential amenity and privacy effects on residential zones; and*
- *mitigate adverse wind effects.*



Figure 13 - Example of the application of upper-floor setbacks making upper-floors of a commercial building “disappear” at street level

²² See for example Town Centre Zone - Rule H10.6.3 Building Setbacks at Upper Floors

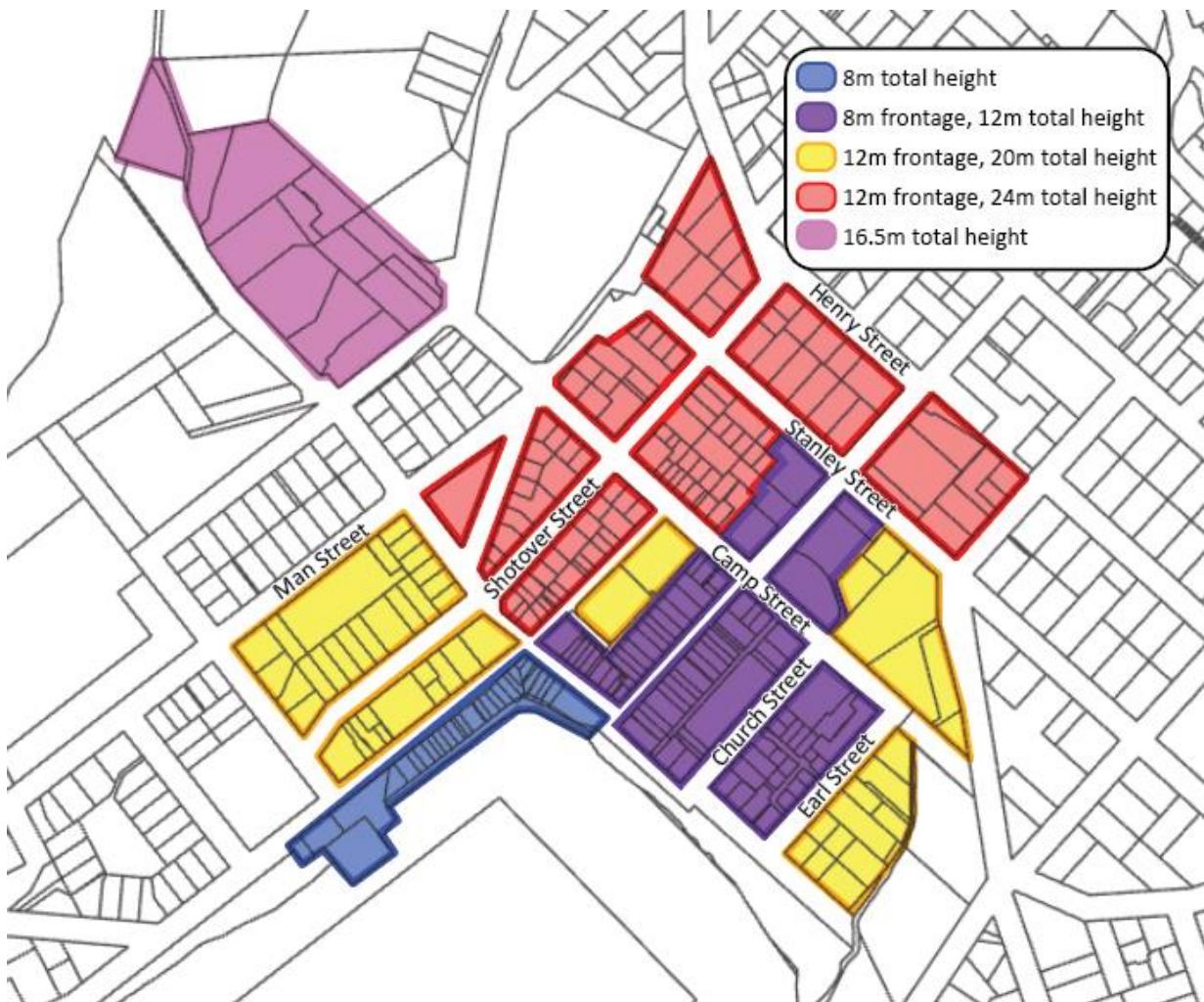


Figure 14 - Recommended Building Height Strategy

An increase in building height will invariably result in additional shading – this fact was acknowledged in the commissioner’s report as part of the hearings on Chapter 12 of the PDP. To understand the implications of this a digital 3D model of the town centre was constructed. A still of this is shown in Figure 15 overleaf. It should be noted that any such model generally represents a “worst case” scenario which is unlikely to completely eventuate. In that sense, a shading model helps to demonstrate where shadows could fall, rather than where they will fall. There are a range of reasons why this is unlikely to eventuate in its entirety, including:

- Developers may not choose to maximise development potential on a given site;
- Landowners may not choose to develop at all;
- New buildings would, ideally, be subject to some form of design review process which is likely to encourage an appropriately articulate/ modulated building form that responds to its context as well as internal function; and
- Additional rules such as outlook controls could apply and result in greater physical separation between buildings than the model has assumed.

The 3d model has demonstrated that direct sunlight is still obtainable over parts of key public open spaces during winter months. However, it is notable that shading from existing buildings as well as Queenstown Hill

and Ben Lamond already has a significant impact throughout the day. However, during site visits it was noted that the presence of shadows did not deter use of these areas and areas like Marine Parade, Earnslaw Park and the Village Green retained good levels of activity during night hours. This demonstrates that there are a range of factors (outside of direct sunlight) that are important in making a space successful.



Figure 15 – Theoretical worst case (full development) sunlight access to town centre open spaces example. Model date of 21 July @ 10.30am demonstrates that the four main open spaces (Village Green, Earnslaw Park, St Peters Church and Marine Parade) within the town centre would still receive direct sunlight at certain times during winter months with recommended height increases. Note: adjacent HDRZ and PC50 areas have been shown for context.

6.3 Town Centre Transition Sub-Zone

The Town Centre Transition Sub-Zone (TSZ) applies to four blocks immediately surrounding the QTC. The TSZ features a limited number of bespoke provisions relating to design and activities. These require high quality comprehensive developments within the Town Centre Transition Sub-Zone which provides primarily for pedestrian links and lanes, open spaces, outdoor dining, and well-planned storage and loading/ servicing areas within the development.

Land ownership within the TSZ appears highly fragmented and generally does not pass-through entire blocks. This sets up a potential situation where the applicable development standards (75% building coverage) and matters of discretion seek to promote outcomes which may not be deliverable. Similarly, matters of discretion related to building coverage seek to cover a number of factors not related to building coverage including activities which may or may not even form part of an application (e.g. references to outdoor dining).

In light of the above, the urban design merits of the standards relating to the TSZ as they relate to building coverage, pedestrian links and outdoor dining may be limited. Whilst it is acknowledged that pedestrian links and outdoor dining can both create positive urban design outcomes, they remain context specific and there are situations where they may not achieve the intended outcomes (e.g. a new pedestrian link which doesn't respond to any obvious desire lines and has limited footfall potential). The areas that the TSZ are already on relatively small urban blocks and there is benefit in concentrating higher footfall on key streets to better support retail viability – this is to say too much permeability can also be a negative urban design outcome. It

is considered that the outcomes sought can be achieved by other more appropriate means such as reference to design guidelines as part of an overall design assessment or by providing development bonuses. It is noted that Auckland City Centre's planning framework has historically incorporated density bonuses for the provision of pedestrian lanes and other amenities such as public artwork.

In light of the NPS-UD's more enabling intent, the existing approach of seeking to limit development capacity to potentially provide some desirable qualities, could be reconsidered to enable further development if an expansion to the application of design guidelines or inclusion of development bonuses are provided. In the absence of these changes, retention of the status quo controls has the potential to provide some limited benefits in urban design terms.

6.4 Other Standards

6.4.1 Minimum Ground Floor Heights

In addition to the recommended increases in potential height across QTC and removal of the TSZ, the zone provisions could benefit from inclusion of an additional standard requiring a minimum ground floor height of 4.0m. There would be two benefits to such a standard:

1. It ensures flexibility for a range of commercial uses can be maintained for the building noting that the fit-out of commercial, office or retail uses will result in a range of floor-to-ceiling heights whilst accommodating increased servicing requirements (as opposed to residential uses); and
2. Avoids a situation where the ground floor height is reduced to accommodate an extra level of residential development built to Building Code minimum, undermining Point 1 above.

6.4.2 Sunlight Admission

To support a change in the permitted height limits, I would also consider it necessary to amend the applicable sunlight access control to align with the sunlight access controls for any adjoining residential zones for consistency. In this instance, I would consider an 8m + 60° sunlight admission recession plane appropriate to enable anticipated building forms within the QTC whilst supporting an appropriate transition in building scale/amenity at this interface where adjoining the MDRZ or HDRZ (depending on final zone extents). No sunlight admission standards should apply to the interface with other commercial zones or road boundaries.

6.4.3 Outlook

In addition to general increase in height within the QTC, I consider that inclusion of an outlook standard (consistent with the approach of the MDRS, Frankton Flats B and notified Te Pūtahi Planning standards) would be beneficial.

This standard would require a minimum 6m x 4m outlook space from the primary indoor living room from a residential unit and 1m x 1m from bedrooms. This outlook space must be accommodated within the parent site (but can extend over streets/ open spaces).

I consider that this would have several benefits in that it:

- Provides potential for the creation of building separation at upper levels between sites should a residential development be proposed;
- Will help support on-site amenity for future residents (in terms of access to daylight and views to the surrounding landscape);

- Increase opportunities for daylight/ sunlight penetration into surrounding streets and open spaces; and
- Provides potential opportunities for views around buildings and over sites to the surrounding landscape.

A policy approach adapted from the AUP to support this type of rule and provide guidance for assessment of any infringement is identified below:

- (X) Require residential accommodation to be designed to meet the day to day needs of residents by:*
- (a) providing privacy and outlook; and*
 - (b) providing access to daylight and providing the amenities necessary for those residents.*

6.5 Objectives, policies and matters of discretion

Increased building heights and density of development and the general approach to intensification recommended within the QTTC and surrounds would give rise to a number of consequential amendments to various QTTC provisions. These include:

- a. Amend Policy 12.2.2.3 (c) to remove reference to “footpaths”.
- b. Including an additional policy and matter of discretion addressing on-site amenity for future residents to provide clear policy direction for the inclusion of outlook standards.8.7(b)(c)(i) from the notified Te Pūtahi planning provisions provides a useful basis for this (noting that any reference to sunlight should be replaced with daylight).
- c. Amend the Queenstown Town Centre Design Guidelines to remove any reference to specific development standards.

7.0 Wānaka Town Centre Zone

7.1 Review

There are several references within the Wānaka Town Centre Zone (**WTC**) zone provisions referencing a desire to retain the existing character and amenity (in its broadest sense) of Wānaka town centre. It is understood that the local community generally values the low density of development in Wānaka Town Centre. However, the characteristic of an existing low density of development within the context of national policy direction which seeks to enable greater density in urban environments, particularly in centres, does not justify preventing higher density in the future. In addition to proximate access to a wide range of services, Wānaka Town Centre also benefits from significant natural amenity with north facing views over the Lake. This makes it particularly well suited for more intensive forms of commercial and residential development. The Town Centre performs well in terms of relative demand with the land values in this area likely to make intensive development more feasible (and realisable).

7.2 Bulk & Scale

7.2.1 Height

As a general comment, an analysis of accessibility and demand highlights that WTC has higher levels of accessibility than the majority of the urban areas across the district behind only Queenstown Town Centre and Frankton/ Remarkables Park. The area also performs well in terms of relative demand. As such, an increase

over and above existing levels of development is considered warranted – especially in light of recommendations to amend the bulk and density standards of the adjacent MDRZ.

In determining what appropriate heights/ densities would be for the area we have considered other existing height limits which exist for centres within both the Operative and Proposed District Plans as well as recommendations covering Queenstown Town Centre, the Local Shopping Centre Zone at Frankton and High Density Residential. Based on these factors, a height limit of up to 20m could be considered commensurate with the level of accessibility/ demand as well as the Town Centre's role as the primary centre serving the Upper Clutha area. This would generally enable development up to 5 or 6-storeys depending on the nature of activities a development is intended to accommodate.

Consistent with the recommended approach to increased heights recommended in Queenstown Town Centre, there is also potential to consider a stepped response to building heights based on Wānaka's unique landscape context with lower building heights enabled adjacent to the lakefront, rising as one moves away. This approach could utilise existing building heights of 12/14m for sites fronting the lakeside stretch of Ardmore Street and Dungarvon Street, rising to up to 20m behind in other areas of the town centre. This would result in a slight reduction in development potential within the town centre. However, there would be some urban design benefits from such an approach, including:

- Lower building heights adjacent to the lake would help preserve northern views over Lake Wānaka for other sites which seek to maximise more enabling building heights. This has the ability to enhance amenity (and potentially feasibility) of development in other parts of the town centre;
- Buildings fronting Ardmore Street could act as a screen to higher buildings throughout the town centre when viewed from the lakefront/ Outstanding Natural Landscape (**ONL**), helping to maintain the “human scale” of the Town Centre.
- Lower buildings fronting Ardmore Street would support a transition in building scale from the natural lake through to the centre consistent with the approach recommended by the ‘urban transect’ concept.

Related to the above, I consider that a lower height limit within Wānaka Town centre as opposed to Queenstown Town Centre and other commercial centres around Frankton is an appropriate response to the contextual differences in the role and function of the Wānaka and Queenstown urban areas. Higher height limits in Queenstown will aid with overall legibility of urban environments across Queenstown Lakes and help to reinforce the greater commercial, employment and social opportunities that are available to existing and future residents in Queenstown. Regardless of the adopted height, height intervals should be stepped based on the ability to accommodate a full floor of development. In other words, increased height limits of, for example, 1m would be performative rather than delivering any tangible benefit in realising increased development capacity.

7.2.2 Building Setback at Upper Floors

In addition to an increase in the height limit to up to 20m, it is recommended to include a specified building setback of 6m from the road boundary above 12m building height consistent with the approach to Queenstown Town Centre. 3D modelling indicates that if all sites are developed to their maximum envelope, sunlight can be retained in the morning on the southern portion of east/west footpaths around the town centre across most of winter consistent with the existing approach in the zone. As previously highlighted, this approach has a number of benefits including:

- New development as viewed from the street would retain the predominant “low-scale” 3 to 4 storey character which is prevalent across the town centre;
- A set-back of 6m as viewed from the street could effectively “hide” around 2 additional storeys of development enabled from the increased heights and is consistent with the design approach seeking to apply to the 4th storey in the existing P1 height overlay;²³
- It provides opportunities for upper-level balconies/ communal open spaces that could benefit from access to sunlight from their elevated position; and
- Where applicable, maintains a degree of sunlight access during winter months, noting also that not all sites will likely be redeveloped to the intensity enabled meaning some existing lower heights across the town centre will remain providing further opportunities for sunlight penetration to surrounding streets and open spaces.



Figure 16 - Wānaka Bulk and Scale (at 20m height) showing shading at 9am on 21 June. Sunlight can be maintained to the footpath even with all sites fully built out to recommended controls.

In addition to a general increase in permitted height limits, the inclusion of a minimum ground floor height as recommended for QTC and other commercial zones (refer to Section 6.2.4 and 6.5.1) would be beneficial.

7.2.3 Sunlight Admission

To support a change in the permitted height limits, I would also consider it necessary to amend the applicable sunlight access control to align with the sunlight access controls for any adjoining residential zones for consistency. In this instance, I would consider a 8m + 60° sunlight admission recession plane appropriate to enable anticipated building forms within the WTC whilst supporting an appropriate transition in building scale/amenity at this interface where adjoining the MDRZ or HDRZ (depending on final zone extents).

²³ If a lower maximum height limit is adopted it would be recommended to reduce the length of the setback to no more than 4m due to the reduced extent of building height above 12m.

7.2.4 Outlook

In addition to general increase in height within the WTC, I consider that inclusion of an outlook standard (consistent with the approach of the MDRS, Frankton Flats B and notified Te Pūtahi planning standards) would be beneficial.

This standard would require a minimum 6m x 4m outlook space from the primary indoor living room from a residential unit and 1m x 1m from bedrooms. This outlook space must be accommodated within the parent site (but can extend over streets/ open spaces).

I consider that this would have several benefits in that it:

- Provides potential for the creation of building separation at upper levels between sites should a residential development be proposed;
- Will help support on-site amenity for future residents (in terms of access to daylight and views to the surrounding landscape);
- Increase opportunities for daylight/ sunlight penetration into surround streets and open spaces; and
- Provides potential opportunities for views around building and over sites to the surrounding landscape.

7.3 Objectives, policies and matters of discretion

Increased building heights and density of development and the general approach to intensification recommended within the WTC would give rise to a number of consequential amendments to various WTC Zone provisions which I believe would be beneficial in assisting with the review of new development. These include:

- a. Amend Policy 13.2.1.2 to remove reference to a “lower level of residential amenity” – this should be more specific (e.g. aural amenity) noting that living within a centre zone can provide for a high-level of amenity for residents (e.g. proximity to services) to help alignment with Policy 6 of the NPS-UD.
- b. Amend Objective 13.2.3 and Policy 13.2.3.1 to remove references to low-rise/ two to three storey development.
- c. Including an additional policy and matter of discretion addressing on-site amenity for future residents to provide clear policy direction for the inclusion of outlook standards.8.7(b)(c)(i) from the notified Te Pūtahi planning provisions provides a useful basis for this (noting that any reference to sunlight should be replaced with daylight).

7.4 Wānaka Design Guidelines

There would be consequential changes required to the Wānaka Design Guidelines which refers to specific standards and general low-scale nature of existing development. The general principles to design and development such as breaking down building forms, responding to a human scale of development remain appropriate and should be retained, however the design guidelines should be more future focussed and enable buildings within the town centre to continue to evolve and change.

8.0 Arrowtown

8.1 Arrowtown Residential Historic Management Zone

The Arrowtown Residential Historic Management Zone (**ARHMZ**) covers the older part of the residential settlement of Arrowtown. The PDP notes that the area has a distinctive character and atmosphere which has evolved from the development pattern set at the time of early gold mining in the District. The ARHMZ seeks to retain the early subdivision pattern and streetscape, and ensure future development is of a scale and design sympathetic to the present character. Aerial photography and the Arrowtown Design Guidelines indicates that a large portion of development in the ARHMZ has occurred post 1960, however the zone does contain a notable concentration of scheduled trees and listed heritage buildings whilst a portion is also included within a Historic Heritage precinct. Listed buildings are typically single-storey miner's cottages which are modest in overall scale and generally positioned within relatively large sites. This indicates that the existing design framework of the ARHMZ combines elements of both Historic Heritage (s6(f)) and character (s7(f)).

Key design related controls of the ARHMZ include:

- A 5m height limit;
- A density limit of one dwelling per 650m²;
- A building coverage of 30%;
- Side and rear setbacks of 3m;
- Front yard setbacks of a minimum of 6m; and
- An ancillary “residential flat” no greater than 70m².

The concentration of heritage buildings (and character trees) is a distinctive component of the ARHMZ from many other typical “character” areas (including the “New Town” area of Arrowtown) that can be seen in both the district and nationally. The nature of existing urban development in the area combined with a concentration of listed heritage buildings justifies a different contextual response in urban design terms. More intensive development in terms of height, bulk and scale would be unsympathetic to the heritage buildings and could undermine their value. As such, considerate is considered that the existing provisions are generally appropriate in urban design terms with the exception of the density limit of one dwelling per 650m².

With regards to density controls, there would be merit in enabling duplex style²⁴ development.²⁵ In this instance, additional density can be accommodated in a built-form outcome that is identical to what the existing provisions enable as these units would need to be provided within a single building subject to the same height, building coverage and setback rules. To accommodate this within a standard site (generally over 1,000m²) of the ARHMZ, a density control of 1 dwelling per 500m² would suffice however this would only apply to a duplex configuration of the portioning of an existing building to avoid an issue of a separate dwelling being developed in the rear yard of an existing property and undermining the “openness” of the existing area. A change of this nature would also require a consequential change to rules around “residential flats” and limit these to one per site, rather than tied to an individual dwelling.²⁶ An approach in line with the above has been sought by

²⁴ Two dwellings sharing a common wall to one side.

²⁵ Such development would be comparable in scale and density to the existing provisions relating to “residential flats” which are permitted within the ARHMZ subject to compliance with relevant standards.

²⁶ A consequential change to subdivision rules, excluding compliance with standards if an approved or concurrent land-use consent application is sought may also be required to support this.

Auckland Council via their Plan Change 78 which enables “the conversion of a principal dwelling as at September 2013 into a maximum of two dwellings” as a permitted activity.²⁷

For completeness, I note that a distinct characteristic of the ARHMZ is the mature vegetation in the area, including street trees. Street trees would not be impacted by more intensive residential development (with retention of the site coverage standard) and many trees on private land are already protected through a Character Trees schedule within the PDP. These trees, where present, would form an obvious constraint to the ability to deliver more intensive building typologies.

8.2 Arrowtown Medium Density Residential Zone

In addition to the matters discussed with regards to the MDRZ in Section 4.0, the PDP includes bespoke provisions covering the nature and style of medium density development within Arrowtown. Objective 8.2.4 requires medium density development to occur in a manner compatible with the town’s character.

The extent of MDRZ zoning in Arrowtown is limited to the area identified as the “New Town” within the Arrowtown Design Guidelines 2016. A notable feature of the existing character in the New Town neighbourhoods is the generally low-density and scale of development, along with a development pattern consistent with post-war development. This is characterised by a more curvilinear street and block pattern with cul-de-sacs. Architectural styles are consistent with progressive periods of development and the urban form of the New Town is comparable to many other urban areas in the District and New Zealand constructed since World War II. While some people may have the view that the existing patterns of development in the New Town area of Arrowtown may have value for functional or aesthetic reasons, it is difficult to suggest that these are particularly unique to Arrowtown or of the District more broadly. This type of development is likely to be reflective of development trends and feasibility of the time rather than a specific desire to retain the character of Arrowtown.

While a key characteristic Arrowtown is the relatively low density and 1-2 storey buildings, the main purpose of the NPS-UD and PRPS and is to enable greater density in urban environments, and the existing presence of low-density residential development does not justify preventing a higher density of development in the future. Accessibility mapping has identified that areas of Arrowtown perform relatively well against other urban areas in terms of access to a range of commercial and community services. From an urban design perspective, the existing nature of urban development should not undermine the benefits of intensification within the MDRZ in Arrowtown. As such, I do not believe there are any urban design grounds for Arrowtown specific restrictions related to development within an MDRZ. I also note that other specific characteristics of the New Town areas of Arrowtown would not be impacted by the type of development that would be enabled by the MDRZ. These characteristics include topography (such as the urban areas position within a wider landscape defined by surrounding river valleys and mountain ranges), presence of public open spaces, and the pattern and design of the road network.

8.3 Arrowtown Town Centre

Arrowtown Town Centre is confined to two blocks of land bounded by Ramshaw Lane, Wiltshire Street, Arrow Lane and Berkshire Street. The Town Centre zone also sits entirely within the Arrowtown Town Centre Heritage Precinct. The Statement of Significance within the PDP notes that “it contains heritage buildings / structures that are of high aesthetic and architectural significance within the District and wider region as authentic examples or representation of a goldfields’ town dating from the 1860s and 1870s.”

²⁷ Table D18.4.1 (AC1).

The PDP places a number of restrictions on demolition, modification or redevelopment of scheduled heritage buildings and places. For non-scheduled sites, design related controls from Chapter 14 apply. Key controls include:

- Restricted Discretionary consent for all new buildings and residential activities;
- Building coverage of 90%;
- A 7m height limit; and
- A 3m set-back from rear boundaries.

The built form and urban design of Arrowtown town centre is uniquely distinct from other town centres both within the district and region, as well as nationally. The majority of buildings are 1-2 storeys in height and generally fall with the topography giving the appearance of a predominantly single storey centre. The existing building heights, scale and pattern of development contributes to a very specific historic architectural quality which could be undermined through the provision of increased building heights in this location. I note that the existing provisions already enable building heights of 7m/ 2-storeys and may, depending on topography provide opportunities for a concealed/ semi-sunken third storey. This generally provides opportunities for the potential for an additional storey of development adjacent to heritage buildings which is an appropriate design response to the context and recognised heritage characteristics of Arrowtown Town Centre. Excluding height, other built form related provisions within the zone do not create any theoretical limits on density.

9.0 Other Business Zones

9.1 Business Mixed Use Zone

The BMUZ is primarily applied to fringe areas north of Queenstown Town Centre, Frankton Marina, north of Frankton Road, north of Wānaka Town Centre and Three Parks. The accessibility analysis indicates that these areas feature between high and moderate levels of accessibility.

Building heights of 12m are already enabled within the BMUZ (as a permitted activity). Additional building height of up to 15m (Frankton Marina) and 20m Queenstown and Frankton North can be sought as a restricted discretionary activity. Building heights above these can be sought as a Non-complying activity.

In addition, a generous building coverage of 75% is also provided for. There are no specific standards which I can identify that would further restrict the height and density of development with the exception of some sunlight and setback provisions. Retention of the 3m building setback adjacent to a residential zone and 4.5m from the property boundary adjacent to Horne Creek are appropriate – especially when considered with my recommendations on height below.

9.1.1 Height

The general distribution and variation in heights across the BMUZ is well aligned with the results of the accessibility analysis. However, they would benefit from consequential changes based on recommended increases to the town centre zones and HDRZ with Wānaka and Frankton Marina increasing to 16.5m with 20m retained for the remaining BMUZ areas. As assessment of new buildings is already required under Rule 16.4.4, the tiered approach to activity status for building height could be removed with an increase of permitted heights to be equivalent of the existing non-complying activity for infringements to the maximum heights. A design assessment of the building would still be required via a restricted discretionary activity

consent under Rule 16.4.4. These recommended changes to permitted heights would also require a consequential change to the Business Mixed Use Design Guidelines.²⁸

9.1.2 Sunlight Admission

To support a change in the permitted height limits, I would also consider it necessary to amend the applicable sunlight access control to align with the sunlight access controls for any adjoining residential zones for consistency. In this instance, I would consider the following appropriate to enable anticipated building forms within the BMUZ whilst supporting an appropriate transition in building scale/ amenity at this interface:

- Where adjoining the MDRZ or HDRZ: 8m + 60°
- Where adjoining the LDSRZ: 4m + 60°

I do not consider it necessary or appropriate in urban design terms to include sunlight access controls for sites adjoining other commercial zones or from a road/ open space boundary.

9.1.3 Outlook

In addition to general increase in height within the BMUZ (and consistent with my recommendations in section 6.4.3), I consider that inclusion of an outlook standard for residential activities (consistent with the approach of the MDRS, Frankton Flats B and draft Te Putahi Planning standards) would be beneficial. I note that “outlook” can already be considered as a matter of discretion under Rule 16.5.8.

9.2 Local Shopping Centre Zone

The Local Shopping Centre Zone (**LSCZ**) is located throughout the urban environment of the District with two-to-three storey development typically provided for. With the exception of the LSCZ located at Frankton, Local Shopping Centres are, relatively speaking, not located in areas of higher accessibility within the district. As such, it is not considered necessary to modify the existing standards as they relate to the LSCZ to any significant degree. The two exceptions to this would be:

- a need to consider consequential changes to provisions covering height and Sunlight Access to align with any changes to zone provisions of adjacent zones; and
- Provisions related to the LSCZ at Frankton.

9.2.1 Consequential Changes

With regard to consequential changes, increased heights and a more relaxed Sunlight Access control should be sought if an LSCZ lies adjacent to a proposed MDRZ or LDSRZ (assuming increased heights as recommended in this report are sought).

An approach could be to remove a specific height control for the zone and instead adopt a rule limiting height “to no more than 2m above the maximum permitted heights in the immediately adjoining residential zone”. The slight increase in height will provide opportunities to reinforce the LSCZ’s centre function through urban form. Similarly, where the LSCZ adjoins a residential zone, the least restrictive sunlight access/ recession plane of that zone could apply. For example, if an LCSZ sits adjacent to a revised MDRZ the applicable Sunlight Access control would be 4m + 60° from the boundary.

²⁸ Page 7 – reference is currently made to 2-3 storey development in the Wānaka Business Mixed Use zone.

9.2.2 Frankton

Frankton is identified as having a high degree of accessibility and benefits from its proximity to more frequent public transport services, schools, significant open spaces as well as relative proximity to the two major employment nodes in Queenstown. In addition, the Queenstown Spatial Plan identifies the Frankton area as having a “Metropolitan Centre” role in the future whilst the Frankton Masterplan also noted opportunities for transit orientated and mixed-use development.

Changes to the Frankton LSCZ could be via bespoke provisions (consistent with the current approach in the PDP) or the application of a different zone framework noting previous Council strategies have highlighted mixed-use and metropolitan centre functions for the area. However, I note that this may require more detailed consideration of the economic effects/ function of this centre and may be more appropriate as part of a future full plan review. Regardless of this, I consider that Frankton’s identified role in Council strategies as well as its performance within the accessibility analysis clearly identifies it fulfilling a more important centre role than other LSCZs. As such, my preference would be for the application of a Town Centre Zoning with some BMUZ around its periphery to enable a market led expansion of commercial uses in the future and further support any residential intensification. A secondary option could be the application of the BMUZ with some additional frontage controls preventing ground floor residential uses in certain locations²⁹ as is currently applied to the Gorge Road BMUZ.

The existing PDP rules that relate to the LSCZ in Frankton place additional restrictions on the scale of commercial activities within this zone. I understand these are to address potential traffic concerns on the adjacent State Highway network. I make no comment on the suitability of these restrictions and note that my recommended changes would predominantly be focused on enabling greater housing intensification opportunities within and around the Frankton Centre.

With regard to enabling greater opportunities for residential intensification in the Frankton Centre, there would also be benefit in including some additional amenity related standards for residential uses to ensure a minimum standard of residential amenity is provided or sufficiently considered through a resource consent process.

Based on the above, my specific recommendations³⁰ include:

- a. Rezone the Frankton LSCZ to a TCZ (or alternatively the BMUZ with bespoke retail controls);
- b. Increase permitted height limits in Frankton centre to 20m;
- c. Amendments to the Sunlight Access controls (Rule 15.5.2) to allow for development up to 8m + 60° adjoining any HDRZ or MDRZ. No sunlight access restrictions should apply to sites adjacent to any BMUZ or along road/ open space boundaries.
- d. Retain a 3m setback adjacent to a residential zone or open space zone.
- e. Add a new standard requiring a minimum 6m x 4m outlook space from the primary indoor living room. The outlook space must be accommodated within the parent site (but can extend over streets/ open spaces). This is needed to address increased bulk along the side and rear boundaries

²⁹ Ground floor residential restrictions would most logically apply to frontages with State Highway 6 and 6A and McBride Street (north of Gray Street).

³⁰ I note that Frankton is subject to restrictions relating to aircraft noise and that this may be considered a “qualifying matter” justifying. The existence of the aircraft noise contour is outside my area of expertise and its potential impacts on realising greater levels of intensification, has not been considered in my recommendations.

as a result of relaxed height/ HIRB standards. This will provide a degree of separation between taller residential buildings and adjacent residential sites to address potential privacy concerns.

- f. Include an additional matter of discretion addressing on-site amenity for future residents under Rule 15.4.3 to better enable consideration of unit size/ orientation etc. in light of the intensification opportunities provided from increased building height in Frankton.
- g. Inclusion of reference to waste and recycling space storage spaces within the matters of discretion to enable consideration on a site-by-site basis depending on the preferred method of collection.

9.3 Three Parks Business

The Three Parks Business Zone (**TPBZ**) effectively functions as a light industrial zone. In terms of built form outcomes, the zone limits development to 10m/ 3-storeys in height and also includes provisions for fairly generous setbacks. Buildings not intended for use for Industrial and Service activities have a further limitation through the application of a 34 degree sunlight admission plane.

The standards generally seem appropriate based on the nature of activities provided for as well as a method for managing potential interface issues with sensitive land uses such as residential activities. However, it is not clear (in design terms) why buildings not intended for “Industrial and Service activities” have additional controls imposed on them that could restrict building height. The implication appears to be that buildings used as, for example, “showrooms” give rise to greater/ different adverse visual effects than those used for an industrial activity.

In addition, as a general matter of principle, the use of both height limits in units of measurement and number of storeys is considered problematic. This introduces an unnecessary level of design specification unrelated to potential adverse effects. It is also not clear how issues such as the adoption of mezzanine floors would be characterised in such a situation. Reliance on a unit of measurement is preferable and ensure consistency in understanding potential built form outcomes across the Plan.

9.4 Three Parks Commercial

The Three Parks Commercial Zone (**TPCZ**) is intended to support the development of Large Format Retail activities. All new buildings require resource consent as a restricted discretionary activity while height is limited to 15m/ 3-storeys subject to sunlight admission planes from residential boundaries. This generally appears appropriate for the intended activities sought to locate within this zone.

As per the comments in Section 9.3, reference to both building height as a unit of measurement and number of storeys should be replaced with just a unit of measurement.

9.5 Industrial Zones

The purpose of the General Industrial and Service Zone (**GISZ**) is to provide for the establishment, operation and long-term viability of Industrial and Service activities. The GISZ seeks to ensure a range of site sizes are available, including for those Industrial and Service activities which require larger buildings and more space for the purpose of outdoor storage. Buildings required resource consent as a restricted discretionary activity and are limited to 10m in height near Frankton and 7m in Wānaka or where adjacent to a residential zone. Recession planes and building setbacks are also applicable where the site is adjacent to or adjoining a residential zone.

Typically, the nature and design of industrial buildings is understandably utilitarian and functional in nature so controls on the size and extent of buildings is important in managing potential interface issues with residential uses and should be retained.

It is noted that the overall height limits do, on face value, appear low and limit flexibility for the types of industrial uses that could locate in these areas. There are an increasing number of precedents of some industrial developments relating to storage and distribution as well as manufacturing seeking to develop buildings upwards of 20m. As the NPS-UD also applies to business zone land it may be beneficial to understand if the height limits create a potential barrier to the development of certain types of industrial activities. Regardless of the above, any increase in permitted building heights would still need to be subject to recession planes and building setbacks at the interface with residential activities. It would also be beneficial to consider additional landscaping requirements within building setbacks to act as a further visual buffer from industrial development should any increases in heights be proposed.

In addition to the GISZ, the Coneburn Industrial Zone enables industrial development in the vicinity of Jacks Point. Permitted building heights are governed by a complex set of height controls based on corresponding ground levels that have been developed in response to this area's proximity to the Remarkables ONL. There is no reason, in urban design terms, to amend existing controls relating to the height or density of development in this location.

10.0 Other PDP Zones

10.1 Jacks Point

The Jacks Point Zone (JPZ) extends from around 3.5km to 8km south of the Kawaru Falls bridge. The majority of the JPZ provides for single storey development with some increased development opportunities provided to support development of a school at two small commercial centres ("villages"). The JPZ has been identified as having a low level of accessibility compared with other areas of the urban environment although this is likely to be partly reflective of the limited non-residential development which has been progressed to date. Longer-term, it still remains some distance from major employment nodes and community services so accessibility is unlikely to substantially change. Accordingly, I do not consider that there are any strong urban design grounds or requirements to align with the NPS-UD which would require reconsideration of the planning standards of this zone.

10.2 Large Lot Residential Zone

The Large Lot Residential Zone (**LLRZ**) is currently applied to areas at the periphery of Wānaka and Hāwea. These areas all perform poorly in terms of their accessibility relative to other areas. As such, I do not consider any strong merits in urban design terms to reconsidering these areas. Rather, these areas do have some benefits in facilitating a greater range of typologies and densities in these locations consistent with the outcomes sought by the NPS-UD.

Appendix 1 – Comparison of approaches to intensification provisions within a Medium Density Zone

MDR Standards		PDP	Rotorua (PC9)	Tauranga (PC33)	Auckland (MHU)	Auckland (PC78)	Kapiti Coast (PC2)	Hamilton (PC12)
Density	1 per 250m ²	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings
Height	Varies between 7m – 8m	11m (+1m)	11m (+1m)	11m (+1m)	11m (+1m)	11m (+1m)	Varies between 11m and 15m	
Daylight Admission	2.5m + 55° (N), 45° (E/W), 35° (S), none on sloping sites	4m +60° (excl. road)	4m +60° (excl. road)	3.6m +73.3° (then 45° above 6.9m)	4m +60° (excl. road)	4m +60° (excl. road)	4m setback above 11m for first 20m, then 4m +60° (excl. roads)	
Coverage	45% building, 75% impervious	50% building, 70% impervious	50% building, 70% impervious	45% building, 60% impervious	50% building, 70% impervious	50% building, 80% impervious	50%-60% building, 70% impervious	
Yards	3m front, 1.5m others, 4.5m garage & State Highways.	1.5m front, 1m others	1.5m front, 1m others	2.5m front, 1m others	1.5m front, 1m others	1.5m front, 1m others	1.5m front, 1m others, 5m garage. Option for 0m on one-side.	
Outdoor Space	n/a	20m ² ground, 8m ² first floor +	20m ² ground, 8m ² first floor +	20m ² ground, 8m ² first floor +	20m ² ground, 8m ² first floor +, extra communal space for 20+ units	20m ² ground, 8m ² first floor +	20m ² ground, 8m ² first floor +, 5m ² service area	
Outlook	n/a	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 1mx1m bedrooms	6mx4m living room, 3m x 3m main bedroom, 1mx1m other habitable rooms	6mx4m living room, 3m x 3m main bedroom, 1mx1m other habitable rooms	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 1mx1m bedrooms	
Building Length	24m above ground floor	22m above ground floor	n/a	n/a	n/a	n/a	15m parallel to side and rear boundaries before a 1.8m deep step-in	
Dwelling Size	n/a	35m ² studio, 45m ² 1-bed+	35m ² studio, 45m ² 1-bed+	30m ² studio, 45m ² 1-bed+	30m ² studio, 45m ² 1-bed+	n/a	n/a	

Appendix 1 – Comparison of approaches to intensification provisions within a High Density Zone

HDR Standards		PDP	Rotorua (PC9)	Tauranga (PC33)	Auckland (THAB)	Auckland (PC78)	Kapiti Coast (PC2)	Hamilton (PC12)
Density	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a – RD for all new residential activities	n/a – RD consent for 4+ dwellings	n/a – RD consent for 4+ dwellings	n/a for apartments, 1 per 100m ² for terraces
Height	Varies between 7m – 15m	19.5m	Varies between 12 - 20m	Varies between 16m – 22.5m	Varies between 16m – 22.5m	20m	21m (+1m)	
Daylight Admission	2.5m + 45° (E,W,S), 55° (N), none on sloping sites	12m +60° (first 23.5m) then 4m +60°	4m + 60° (excl. road)	8m + 60° (first 20m) then 8m + 2m + 60°	19m + 60° (first 20m), then 8m + 60°	4m +60° (excl. road)	4m +60° (excl. roads, open spaces and commercial zones)	
Coverage	70-75% building, 80% impervious	50% building, 80% impervious	50% building, 80% impervious	50% building, 70% impervious	50% building, 70% impervious	50% building, 80% impervious	60% building, 80% impervious	
Yards	2m (all), 4.5m garage & State Highways.	1.5m front, 1m others	1.5m front, 1m others	1.5m front, 1m others	1.5m front, 1m others	1.5m front, 1m others	1m front, 1m others, Option for 0m on one-side.	
Outdoor Space	n/a	20m ² ground, 6m ² first floor +	20m ² ground, 6m ² first floor +	20m ² ground, 5m-8m ² first floor +	20m ² ground, 8m ² first floor +, extra communal space for 20+ units	20m ² ground, 8m ² first floor +	20m ² ground, 8m ² first floor +, 5m ² service area	
Outlook	n/a	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 1mx1m bedrooms	6mx4m living room, 3m x 3m main bedroom, 1mx1m other habitable rooms	6mx4m living room, 3m x 3m main bedroom, 1mx1m other habitable rooms (4+ dwellings)	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 1mx1m bedrooms	
Building Length	30m above ground floor	22m above ground floor	n/a	n/a	n/a	n/a	15m parallel to side and rear boundaries before a 1.8m deep step-in, 4m setback above 11m	
Dwelling Size	n/a	35m ² studio, 45m ² 1-bed+	35m ² studio, 45m ² 1-bed+	30m ² studio, 45m ² 1-bed+	30m ² studio, 45m ² 1-bed+	n/a	n/a	

Appendix 1 – Comparison of approaches to intensification provisions within a Centre Zone

Centre Standards	PDP (QTC)	Rotorua (PC9)	Tauranga (City Centre)	Auckland (TCZ)	Kapiti Coast (PC2)	Hamilton (B3Z PC12)
Density	n/a – RD for new buildings	n/a – RD for new buildings	n/a	n/a – RD for new buildings	n/a – RD for new buildings	2:1 Floor Area Ratio
Height	Varies between 4m – 15m. PC50 includes up to 26m.	Varies between 24m – 32m	Varies between 16m - 48.7m	Varies between 13m – 48.5m (majority 18m- 27m)	21m	20m
Outdoor Space	n/a – building coverage of 75% in transition zone	6m ² or 0m ² if larger units provided	10m ²	n/a	8m ² with no dimension less than 1.8m	8m ² with no dimension less than 1.5m
Outlook	n/a	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 3m x 3m main bedroom, 1mx1m other habitable rooms	6mx4m living room, 3m x 3m other habitable rooms	4mx4m living room, 1mx1m bedrooms	4mx4m living room, 1mx1m bedrooms
Building Length	n/a	n/a	n/a	Max tower dimension of 55m, set back 6m from boundary	n/a	n/a
Dwelling Size	n/a	35m ² studio, 45m ² 1-bed+	35m ² studio, 45m ² 1-bed, 60m ² 2-bed+	30m ² studio, 45m ² 1-bed+	n/a	n/a
Frontages	Some max frontage heights of 6.5m – 8.5m + varying recession planes	3-stories built to front boundary on pedestrian focused street	n/a	6m setback above 18m adjacent to Residential or 27m adjacent to business	n/a	n/a