BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

<u>IN THE MATTER</u>	of the Resource Management Act 1991
<u>AND</u>	
IN THE MATTER	of Plan Change 50 (Queenstown Town Centre Zone Extension) to the Queenstown Lakes District Plan

STATEMENT OF EVIDENCE OF DOUGLAS RUSSELL WEIR FOLLOWING WITNESS CONFERENCING

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1. INTRODUCTION

1.1 My name is Douglas Russell Weir. I have the qualifications and experience set out in my statement of evidence dated 19 December 2014. I confirm that I have again complied with the Code of Conduct for Expert Witnesses in the Environment Court's Consolidated Practice Note in preparing this statement of evidence and I agree to follow that Code when presenting evidence to the Committee.

2. SCOPE OF EVIDENCE

- 2.1 On 16 January 2015 the Committee directed that QLDC could lodge further supplementary evidence limited to matters remaining in dispute following the conferencing of experts. As is recorded in the Joint Witness Statement relating to the conferencing topic of planning and urban design, Mr Gibbs disagreed with the position of Messrs Kyle and Bryce that discussion of the location of the convention centre was premature. He tabled a document titled "Queenstown Convention Centre Site Selection Study, dated 9 February 2015" that he had prepared on the topic of location. The Joint Witness Statement records that I did not agree with the assumptions and conclusions contained in that document.
- 2.2 This statement of evidence addresses the areas where I disagree with Mr Gibbs' opinion, as expressed in that Site Selection Study document.

3. MR GIBBS' ASSUMPTIONS

- 3.1 Mr Gibbs presents his evaluation based on a table where rankings are assigned to various attributes. These attributes are all evenly weighted, which in my view is incorrect. Some of these matters are essential (for example having sufficient space to build the desired convention centre), whereas others are in the category of "nice-to-haves" rather than essentials.
- 3.2 One of the premises of Mr Gibbs with which I do not agree is his approach to accessibility to major hotels. Mr Gibbs limits his consideration to existing hotels only and appears to take little account of new hotels which it is anticipated will be developed within the Lakeview Subzone.
- 3.3 Another attribute that Mr Gibbs identifies as important is the distance to a coach interchange. I disagree with the selection of this attribute. The coach interchange is the bus depot where services such as the Intercity and Naked Bus embark and disembark passengers. I am advised by Populous that most conference delegates would be expected to travel to the conference by taxi, coach or private or rental vehicle. In my experience with convention centres it is not common for attendees at conferences to arrive by public bus service using an interchange such as this. I would not weight such an attribute highly.
- I also disagree with Mr Gibbs' approach to pedestrian accessibility. Mr Gibbs considers walking distance only and appears to show little appreciation of varied qualitative walking experience along routes of similar distances. To me, the most natural walking route to the Lakeview site would be along the waterfront and then up Brunswick Street. This would provide a pedestrian with a beautiful experience of Queenstown's lakefront and many of its key scenic attributes. The Queenstown waterfront, like the Wellington waterfront, is heavily used with people and this is only likely to increase if there is a destination that encourages people to make use of those scenic walkways.

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- 3.5 Mr Gibbs has also assumed a 5,500 m² convention centre footprint, whereas it is my view that a minimum convention centre footprint of 7,500 m² would be required to meet the brief from Queenstown Lakes District Council in terms of the functions and performance of the convention centre. This means that Mr Gibbs' has underestimated the amount of land required to construct the convention centre and its desired functionality.
- 3.6 In considering topography, Mr Gibbs appears to prefer a flat site, whereas it is my view that a sloping site has significant advantages for a convention centre plenary. Location two utilises the existing contours to its advantage by concealing the Back of House areas under the Front of House elements, as well as creating clear multi-event splits though level change.
- 3.7 I do not agree with Mr Gibbs' selected attributes. I prefer the attributes outlined in my original statement of evidence at paragraph 3.5. From my experience working in designing convention centres the attributes set out there (that we used in our Site Selection phase) better reflect the needs and demands of locating a convention centre.
- Table 1 (below) takes the attributes identified in our Site Selection phase and applies them to the four locations within the Lakeview site identified by Mr Gibbs.
- 3.9 Using those criteria location two is my preferred location for the convention centre followed by location four, location one and then finally location three. Location two is clearly the most preferred option, scoring 60, against the next best score of 51 and a lowest score of 35.
- 3.10 In my opinion Location three is a lesser option for the following reasons:
 - The site will struggle to accommodate the area required for a Convention Centre within the proposed street layouts as shown in the Structure Plan. Variation from the street layout will impact the masterplan philosophy and the connectivity of the site.
 - It appears Mr Gibbs' has failed to appreciate there are three existing protected trees within the site of location three, to which will further diminish the available land for development.
 - The existing protected trees aforementioned may pose a problem for clear views from the facility. Significant elevation may be needed in the facility to make the most of vistas, potentially creating an imposing street frontage.
 - The site has four 'public facades' resulting in challenges on concealing 'back of house access'. As a result this may result in an expansion of footprint.
 - With the area of land available, location three will face challenges in footprint to allow for separation of multiple events, something which is critical to the success of such a facility.

Table 1: Evaluation based on Original Populous & FearonHay Evaluation Matrix

	Location 1	Location 2	Location 3	Location 4
Promotion of the Queenstown				
Context View engagement	2	1	2	1
View engagement Proximity to civic amenities	3	4 3	4	4
Integrated developed opportunities	4	4	1	2
Test to Brief Requirements				
Area	2	4	1	2
Functionability	3	4	1	2 2
Functionality and Operations				
Front of house	4	4	4	4
Back of house	2	4	1	3
Loading	1	4	1	3
Accessibility & Connection to				
Queenstown				
Pedestrian	4	4	3	3
Vehicular	4	4	2	3
Service vehicle	2	4	1	4
On site parking (cars/coaches/buses)	3	4	1	3 3
Off site parking	2	2	4	3
Opportunity for Expansion and Growth				
Core use	2	2	1	4
Commercial / retail	4	4	2	3
Site Issues				
Sun penetration	2	1	4	3
Protected trees	1	4	2	4
Total	46	60	35	51
Rank	3	1	4	2

4. MR GIBBS' CONCLUSIONS

- As set out above, Mr Gibbs presents his key conclusions by way of a table evaluating the rankings of his four identified convention sites. He concludes that the best location for a convention centre is Location 3, immediately behind the James Clouston Memorial Reserve. His second preferred location is the area in front of the market square where it is presently contemplated that a hot pools will establish on reserve land. His third preferred location is adjacent to the campground at the rear of the reserve land behind the James Clouston Memorial Reserve. His least preferred location is the location towards the western end of the Lakeview site, where the council currently contemplates the convention centre might locate.
- 4.2 I have taken Mr Gibbs' evaluation table and populated it with my own evaluations (Table 2, below).

Table 2: Evaluation based on BSPL / David Gibbs Generated Matrix

	Location 1	Location 2	Location 3	Location 4
Connection to Queenstown				
Distance to Queenstown Mall	3	3	4	4
Distance to Gondola	3	3	4	4
Accessibility to major hotels	3 3	3	4	4
Proximity to amenities		3	4	4
Distance to Coach Interchange	0	0	0	0
Accessibility from Queenstown				
Pedestrian	4	4	3	3
Vehicular	4	4	2	3 3
Off site parking	2	2	4	3
Site Environs				
Site size / shape	2	4	1	2
Topography	2	4	1	2
Protected trees	1	4	2	4
Views and vistas	3	4	2	1
Site visibility	4	4	3	1
Precinct redevelopment potential	4	4	3	3
Others				
Impact on TC if CC doesn't proceed	2	2	4	4
Ability to implement in short term	4	4	2	2
Total	44	52	43	44
Rank	2	1	4	3

- 4.3 I agree with Mr Gibbs in terms of second- and third-most preferred locations. However, the first- and last-most preferred locations have reversed compared to Mr Gibbs' conclusions. It is my opinion that Location 2 (the site the council currently prefers) is the best site for the desired convention centre and Location 3, immediately behind the James Clouston Memorial Reserve, is my least preferred site.
- 4.4 As I set out above, I do not agree with all of the attributes selected by Mr Gibbs. However, I do agree with his selection of the attribute of views and vistas. It is my view that locations 3 and 4 are completely compromised in terms of views and vistas. Locations 1 and 2 are substantially stronger in relation to this attribute, which in my view is key to the success of the convention centre. Selection by conference organisers of the Queenstown convention centre over other convention centres will rely heavily (among other things) on promotional material that depicts the convention centre with its stunning views of its dramatic landscape setting.

5. CONCLUSION

I do not agree with the way that Mr Gibbs has evaluated the four potential convention centre locations that he has identified. I would use the attributes presented in Table 1 above, rather than the attributes that Mr Gibbs uses. Evaluation on this basis would give me a preferred site of location two, by a substantial margin.

- 5.2 Even if I were to adopt the evaluation criteria selected by Mr Gibbs, I would differ in my evaluation of ranking for those attributes. I would again prefer location two, although not by such a margin. Under both scenarios my least preferred location would be location three.
- 5.3 Allowing for the fact that these approaches don't provide for weighting of the different attributes, I have considered the outcomes presented in the two tables above. I am of the view that location two is the location I most prefer for the convention centre and location three is my least preferred option.

Doug Weir

FearonHay Architects

DATED 18 February 2015