

**BEFORE THE HEARING COMMISSIONERS  
AT QUEENSTOWN**

**IN THE MATTER            of the Resource Management  
   Act 1991**

**AND**

**IN THE MATTER            Proposed Plan Change 50 to  
   the Queenstown Lakes  
   District Plan**

**BETWEEN                BRECON STREET  
   PARTNERSHIP LIMITED**

**Submitter No 50/10**

**AND                        QUEENSTOWN LAKES  
   DISTRICT COUNCIL**

**Applicant**

**STATEMENT OF SUPPLEMENTARY EVIDENCE  
OF ALEXANDER DAVID GIBBS  
FOR BRECON STREET PARTNERSHIP LIMITED**

**Dated 20 February 2015**

### **Introduction**

1. My name is Alexander David Gibbs. I am an architect and urban designer. My qualification and experience were introduced in my primary evidence dated 23 November 2014.
2. I have read and agree to comply with the Environment Court's Code of Conduct for Expert Witnesses contained in the Environment Court Consolidated Practice Note 2014 ("the **Practice Note**"). I have prepared this evidence to meet my obligations under section 5.2
3. This evidence is supplementary to:
  - My primary evidence which was submitted on 23 November 2014 and presented before the Commissioners at the hearing held on 24 November 2014.
  - My supplementary evidence submitted on 15 January and presented before the Commissioners at the reconvened hearing held on 16 January.
  - Queenstown Convention Centre Site Selection Study already filed with QLDC and circulated to the parties

### **Background**

4. The Joint Witness Statement from the Planning and Urban Design Expert Conferencing held in Queenstown on 9<sup>th</sup> and 10<sup>th</sup> of February 2015 records that I tabled the *Queenstown Convention Centre Site Selection Study* dated 9 February. This document was intended to address Item 2. (1) of the *Directions of the Hearings Panel* dated 16 January 2015. Time constraints precluded discussion of the document.

### **Summary of QCC Site Selection Study**

5. The *Queenstown Convention Centre Site Selection Study* examined existing documents dealing with desired attributes for locating convention centres. The key documents are listed under the heading *Further Research* on page 1 of my report. The study then tabulates the attributes against four candidate

sites. Locations 1, 2 and 3 are identical to sites evaluated by Fearon Hay + Populous (“the architects”). A fourth site to the north of location 3 was added to deal with concern expressed by the architects that location 3 is too constrained.

I then ranked each of the sites against the listed attributes. For reasons stated in my report I did not weight the attributes.

My report concluded that location 3, adjacent and to the north of James Clouston Reserve is the superior choice followed by Locations 1 and 4.

### ***Scope of Evidence***

6. Mr Doug Weir has prepared supplementary evidence addressing my study upon which I will comment.
7. To assist the Commissioners I have followed the order and numbering of Mr Weir’s evidence in my own evidence.

### ***Mr Weir’s evidence under the heading “Mr Gibbs’ Assumptions”***

- 3.1 Mr Weir disagrees with the even weighting my ranking table gave to each attribute and observes that in his opinion some of the attributes are “nice-to-haves” and some are essential. I agree with Mr Weir that some attributes are likely to be more important than others but none of them are sufficiently discretionary to fit the description “nice-to have”. My report makes clear that the ranking attributes that I chose came from authoritative sources<sup>1</sup>:
  - The Horwath HTL +WHK feasibility study prepared for QLDC for this project
  - Howath’s report for Auckland City Council
  - The Crouch Louviere report
  - A variety of QLDC’s own document including the s32 report
 Each ranking attribute is referenced to the documents referred to above. In contrast, much of Mr Weir’s evidence relies on his own opinion.

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<sup>1</sup> All reports are detailed under the heading Further Research

- 3.2** Mr Weir notes that my assessment of proximity and accessibility to major hotels only takes into account hotels already built. Mr Weir considers that I should have also taken account of hotels that “it is anticipated will be developed within the Lakeview Subzone” I respectfully consider it would be unwise to place reliance on hotels that may or may not be built in the future within the Lakeview Subzone. The expert conferencing JWS records Mr Kyle and Mr Bryce cautioning against placing too much reliance on the likelihood of the Convention Centre proceeding. In that context consideration of associated facilities such as hotels seems even more conjectural.
- 3.3** Mr Weir relying on the advice from Populous and his own experience disagrees on the importance of proximity of the Queenstown coach interchange and instead opines that “most delegates would be expected to travel to the conference by taxi, coach or private or rental vehicle. In contrast Horwath HTL’s report for QLDC identifies under the heading *Key Selection Criteria For Conference Centre Site* (referring specifically to this project) that “proximity to public transport for those delegates who wish to use it) is the 6<sup>th</sup> of 12 key criteria.
- 3.4** Mr Weir considers that in ranking sites 3 and 4 above sites 1 and 2 in terms of walking distance (proximity to the existing town centre) I have overlooked the “the natural walking route (to site 1 or 2)<sup>2</sup> would be along the waterfront and then up Brunswick St”. Mr Weir is predicting that human behaviour favours a longer “walkabout” as well as a steeper gradient in lieu of a more direct route and gentler gradient, to the same destination. Currently 600,000 people annually travel up Brecon Street to the Gondola<sup>3</sup> and it would seem fair to assume that many of the visitors having walked Brecon Street to reach the Gondola would choose to continue their journey

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<sup>2</sup> My addition in brackets is for clarification purposes

<sup>3</sup> Advised by Mr Jeff Staniland CEO Skyline Enterprises Ltd to my Client Graham Wilkinson on 19 February 2015

along the relative flat of Man St or other routes westwards. This route would clearly favour a site for the convention centre that is closer to the existing town centre.

Mr Weir reveals in his discussion of his preferred approach to sites 1 and 2 a preoccupation with the convention centre as a standalone facility. This goes to the heart of my concern about PC50. In my opinion it will be a huge lost opportunity if the convention centre and associated hotel facilities are not built closer to the town centre where they can have a stimulatory effect on the commercial activities of the town and visa versa.

- 3.5** Mr Weir states that I have underestimated the amount of land required to construct the convention centre and its desired functionality. He stops short of stating what significance that has. I am sympathetic to that stance because that is a difficulty we all face in that there is no specific proposal for the conference centre and no experienced developer of conference facilities has given evidence to this hearing. Notwithstanding that, the diagrams on page 12 of my supplementary evidence deal with this matter. The Howath HTL report supports my assumptions. Irrespective of whether Howath as conference centre specialist or Fearon Hay as architect for the project are correct, location 3 has adequate size as does location 4.
- 3.6** I note Mr Weir's preference for a sloping site for the convention centre. I have no fixed opinion on that matter but note it is not clear what the distinction he discerns between the location options given that all of them slope to the south. Fearon Hay's earlier preference for a flat site was evidenced in their Quenstown Convention Centre Site Analysis Report dated July 2013. On page 1 of that report under the heading *Advantages of Site/Layout* "flat site" is the first of 7 bullet points.

**3.10** In this clause of his evidence Mr Weir states five reasons why site 3 (which is my preferred location) is a “lesser option”

- *Insufficient room within proposed street layout*

This matter has been dealt with under clause 3.5 above

- *Three existing protected trees compromise land area available for buildings*

There are no trees protected under the District Plan register within site 3. Additionally the heritage report prepared by Heritage Properties Limited for PC50 identifies only three trees (or tight clusters of trees) that are protected within the Lakeview Sub Precinct none of which are within location 3.

- *Protected trees may compromise clear views*

Mr Weir has not substantiated why a “clear view” (presumably he means one completely clear of trees in the foreground) is important for the convention centre. Putting that aside, only three trees referred to above are in the Clouston reserve in front of location 3. Should it be deemed essential, there is a process for considering the removal of protected trees.

- *Site 3 has four public facades that cause design challenges concealing back of house access*

It is unclear how location 3 differs from the other three locations in this regard. They can all be viewed from four sides.

- *Land area available for location 3 causes design challenges for separation of multiple events*

I disagree that location three is constrained for the reasons explained above in clause 3.5. Irrespective of that, clever architectural solutions should be possible for all sites.

### **Conclusion**

8. Having carefully considered Mr Weir’s evidence I remain of the opinion that location 3 is clearly superior to the other

candidate sites discussed in evidence, followed by site 4. My conclusion is based upon the imperative that the convention centre and hotel facilities support the existing town centre and visa versa. That is only possible if the convention centre and hotels are within easy walking distance of the town centre and the journey between town and convention centre is a stimulating and attractive experience. The most assured means of achieving that is for the town centre expansion envisaged by PC50 to be contained to a realistic geographical extent and link directly to the convention centre and hotels. Mr Weir's preferred location is too distanced from the existing town centre to meet those needs. Accordingly, locations 1 and 2 would need to have a compelling advantage over locations 3 and 4 as sites for the convention centre to justify such a significant move westwards.

9. If the panel were to conclude that locations 1 or 2 were superior to sites 3 or 4 for the convention centre I consider a planning solution is possible whereby a western sub precinct of Lakeview is zoned to allow that purpose and ancillary activities as recommended in the evidence of Mr Munroe. The eastern sub precinct of Lakeview (including the eastern side of Brecon St) would then carry the expected activities that Town Centre zoning anticipates. The plan attached as appendix 1 shows a possible demarcation between those sectors. The demarcation line has been determined by my previous analysis of the town centre including walkability, topography, layout and structure of the town and previous studies looking at expansion. I have also considered logical land parcels that are contiguous to the existing zone.
10. I support Mr Kyle's recommendation that the Lynch Block should be High Density Residential Zone for the reason that this land is too far removed from the existing town centre to be expected to provide town centre activities. HDRZ will allow provide for visitor accommodation.

A handwritten signature in black ink that reads "David Gibbs". The signature is written in a cursive, flowing style with a large initial 'D'.

**Alexander David Gibbs, B.Arch, FNZIA, Reg'd Architect,**  
20 February 2015