

**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 IAN COLIN MUNRO  
FOR BRECON STREET PARTNERSHIP LIMITED**

**Dated 20 February 2015**

## INTRODUCTION

- 1.1 My name is Ian Colin Munro. I rely on the description of my professional qualifications and experience set out in my primary evidence, dated 21 November 2014. I continue to agree to be bound by the Environment Court's Code of Conduct for Expert Witnesses.
- 1.2 My client Brecon Street Partnership Ltd ("**BSPL**") has asked me to provide further resource management planning evidence in relation to the issues raised by the Panel's minute dated 16 January 2015, and the subsequent process of expert caucusing that has occurred (and which I attended on 9th February 2015).
- 1.3 I have read the Joint Witness Statement (and can confirm I still hold the views I expressed in that Statement), and the supplementary evidence of Mr Kyle and Weir on behalf of the Council. I have re-read the submissions and previous relevant evidence presented to the Panel.

## 2. ISSUES TO BE ADDRESSED

- 2.1 I propose to address two issues only:
  - (a) Additional building height at 34 Brecon Street; and
  - (b) Issues related to convention centre location and the risk of the convention centre not happening.
- 2.2 In respect of point (b), I confirm that this is beyond the submission made by my client and on which my primary evidence was focused. My client has expanded my brief to allow me to assist the Panel in addressing the matters it has identified.

## 3. 34 BRECON STREET SUBMISSION

- 3.1 Prior to the expert caucusing process, the Council's experts, on one side, and Mr Gibbs and I, on the other, disagreed in respect of

shadowing, townscape (aesthetics), cemetery (loss of views) and cemetery (dominance) effects. The caucusing process has led to agreement now being reached that shadowing effects from the additional building height sought would not be problematic.

- 3.2 It is relevant in my mind to record that the remaining effects of concern to the Council's experts are entirely subjective in nature. Across the Hearings Process, a number of quantifiable adverse effects of concern have been identified by the Council's experts and systematically addressed by either Mr Gibbs or I.
- 3.3 In respect of those remaining effects, I record that I remain of the opinions expressed in my primary and supplementary statements and support the up-zoning of 34 Brecon Street as the most appropriate way to both achieve the District Plan's objectives and policies, and in turn promote sustainable management. Turning specifically to the direction of the Panel, I can confirm that my analysis has at all times been based on looking at the cemetery environment as a whole and in the round.

#### **4. CONVENTION CENTRE LOCATION AND LIKELIHOOD**

- 4.1 When I presented by primary evidence I was of the unambiguous understanding that the Council was only proposing a convention centre in its preferred location. My reason for this is that the structure plan is demonstrably and clearly based on only this eventuality, including the provision of a civic open space and tallest hotels proposed to form a "civic precinct" anchored by that major community facility.
- 4.2 It took me by surprise when the Council confirmed that it had no such position and that its planning for a convention centre remains in a sufficiently early stage that one could eventuate anywhere in the Lakeview Zone (or presumably not in the Lakeview zone or at all).
- 4.3 I have reconsidered my position in light of this clarification. I remain of the view that the site preferred by the Council would be workable for a

convention centre. It could not in my opinion be described as the “best” site for a convention centre, and I remain in favour of the analysis of Mr Gibbs in that respect including the rebuttal he has provided of Mr Weir’s criticisms. In any event, I do not see that PC50 will turn on a single convention centre site being identified and promoted exclusively, so the material resource management issue is that in the Lakeview zone there exist a number of locations that could support a successful convention centre and PC50 provides for all of them to be realised.

- 4.4 The issue must then turn to what should happen to those “unlucky” sites that are not developed as a convention centre, which could be all of them in the event that no convention centre occurs (or if one occurs elsewhere such as in the Remarkables Park area).
- 4.5 Numerous submitters have expressed concern with the proliferation of general commercial and retail activity across the Lakeview zone but in particular the western extent. As I understand the Council’s work, the western end of the Lakeview zone has only been promoted on the basis that it is the Council’s preferred location for a convention centre; I am unaware of any evidence or suggestion that it would be spatially desirable for general retail development such as a shopping centre to occur in isolation in that part of Queenstown.
- 4.6 Mr Kyle has accepted much of this concern in his recommendations as they have evolved across the Hearing. His latest recommendations are intended to further restrict commercial activities, with priority being given to residential, visitor accommodation, and convention centre activity.
- 4.7 My analysis of the situation is that a clearer and simpler solution is available that would more directly address the concerns of submitters, logically and defendably grow the town centre’s commercial zone, and protect the Council’s ambition for a convention centre-led development on its preferred site.

- 4.8 My starting point is to “forget about” a convention centre and on a principled basis look purely at where in the proposed Lakeview and Isle St zones a commercial town centre zone expansion would be desirable. I am not convinced that such an exercise has led the Council’s approach. In my view the evidence of Mr Gibbs is comprehensive and indeed the only explicit evidence presented to the Panel that addresses this matter, taking into account walkability, the town’s existing structure, previous plans for expansion, and the Council’s analysis of demand and need. For this reason I prefer his conclusions and recommend them to the Panel. In short, The area of Brecon Street already identified as having a commercial activity overlay, the Isle Street sub zone, and the land west of Brecon Street to the point identified in Mr Gibbs’ alternative plan should be rezoned as per PC50 (“**Lakeview East**”). In this land, any of the activities provided for in the town centre zone, including retail and commercial activity, would be appropriate. A convention centre would also be appropriate in this part of the zone as per PC50.
- 4.9 The proposed Lakeview zone west of Mr Gibbs’ town centre boundary (“**Lakeview West**”) is in my view best suited to non retail and non commercial activities in general, but should be developed to high intensity “centre-supportive” activities. Residential and visitor accommodation activities are most suited here, and a convention centre would also be appropriate. Retail and commercial activity ancillary to visitor accommodation or a convention centre would be desirable too. In other words, in Lakeview West, PC50 as proposed should apply except that any commercial or retail activity not ancillary to visitor accommodation or a convention centre should be fully discretionary activities. I am in addition comfortable with Mr Kyle’s proposal that a portion of High Density Residential zone also be applied as per his latest recommendations (over the “Lynch Block”).
- 4.10 This leads me to a conclusion not dissimilar to the latest opinion of Mr Kyle, but is one that is clearer, simpler, and does not get tangled in the need to distinguish between what commercial activities are or are not caught up in a consent requirement, and for what reasons. My experience is that having consent requirements for some commercial

activities and not others often creates numerous baselines and practical difficulties 'holding the line' in practice. In my view my recommendation protects the Council's land use preference for this part of Lakeview and also more directly addresses the concerns of submitters worried about the proliferation and fracturing of the town centre by way of isolated or stand alone retail development. As such it is efficient, effective and premised around economic development and employment.

- 4.11 The major difference between Mr Kyle's and my recommendations is that I feel mine gives better protection to Queenstown and its orderly, logical outward expansion in the event that no convention centre at all occurs. In that scenario, the District Plan would be much clearer on what the land, now over 5,000m<sup>2</sup> – 7,000m<sup>2</sup> GFA or 1 to 1.4ha net land (the approximate size of a convention centre) larger than actually required should be used for. General commercial activity would have a clear "home" as close as possible and contiguous to the town centre. Non commercial but still town centre supportive activity such as visitor accommodation or residential, would also clearly have one.
- 4.12 Turning to the question of building height and bulk, I am comfortable that my recommendation does not lead to any changes to the PC50 height plan or other bulk and location controls (other than to 34 Brecon Street). Although I remain clear in my mind that the Council's structure plan was clearly designed around a convention centre / civic open space / major hotel precinct in one location, I am comfortable with the evidential justification and functional adequacy of the spatial configuration proposed were the convention centre to not occur there. Specifically, a visitor accommodation cluster at the periphery of Queenstown would benefit from the open space areas proposed by the Council regardless of the convention centre's location. Accordingly, the splitting of Lakeview into "east" and "west" precincts does not lead to a reconsideration of underlying PC50 height allowances.
- 4.13 However, the changing location of the convention centre does create one feedback matter in respect of 34 Brecon Street that I have not

previously identified. In my view the Council's structure plan had a desirable logic in co-locating a major hotel close to a convention centre. In the event that a convention centre occurred close to 34 Brecon Street, I feel the same co-location benefit would exist. In other words, the overall merit of additional building opportunity on 34 Brecon Street improves.

## **5. CONCLUSIONS**

- 5.1 My recommendations in respect of allowing greater entitlements to the site at 34 Brecon Street remain unchanged from what I have expressed previously. My only comments in response to the expert caucusing that has occurred is that it is in my mind material for the Panel to note that all quantitative effects of concern to the Council's experts have been addressed. Only subjective effects of concern remain in terms of townscape aesthetics and effects from a medium-rise building on the use and enjoyment of the cemetery.
- 5.2 In terms of the Panel's minute and request for advice regarding scenarios where a convention centre either does not locate on the site favoured by the Council or does not eventuate at all, I have considered these scenarios in light of Mr Kyle's latest evidence with an emphasis on being simple and where possible not needing to 'reinvent the wheel' for the Panel.
- 5.3 I recommend that there is a logical and defensible basis for expanding the town centre zone to accommodate growth. This should be focussed on the Isle St and Brecon Street areas (Lakeview East). In terms of the more distant western part of the Lakeview zone, I recommend that the cleanest and simplest way of moving forwards would be to split this into a sub-zone that provides only for residential, visitor accommodation, convention centre, and commercial activities ancillary to those predominant activities only. No other commercial activity should be provided for. Mr Gibbs has prepared a plan based on his analysis of where this distinction of "east" and "west" should occur and I support it.

- 5.4 In my view such a split would allow the Council to develop its preferred convention centre location if it is able and otherwise still allows for hotels and other similar activities to occur. But it would also prevent the proliferation of general commercial activity away from the town centre that is of concern to a number of submitters. As such I consider my recommendations are a simpler and more logical way of reaching the point that it seems Mr Kyle is looking to arrive at.



20 February 2015

**Ian Colin Munro**

Urban Planner and Urban Designer

B.Plan(Hons); M.Plan(Hons); M.Arch(Hons); M.EnvLS(Hons); M.EngSt(Hons);  
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