

**BEFORE THE HEARING COMMISSIONERS  
AT QUEENSTOWN**

<b>IN THE MATTER</b>	<b>of the Resource Management Act 1991</b>
<b>AND</b>	
<b>IN THE MATTER</b>	<b>Proposed Plan Change 50 to the Queenstown Lakes District Plan</b>
<b>BETWEEN</b>	<b>BRECON STREET PARTNERSHIP LIMITED</b>
	<b>Submitter No 50/10</b>
<b>AND</b>	<b>QUEENSTOWN LAKES DISTRICT COUNCIL</b>
	<b>Applicant</b>

**STATEMENT OF EVIDENCE OF GRAHAM ROSS WILKINSON  
FOR BRECON STREET PARTNERSHIP LIMITED**

**Dated 21 November 2014**

1. My name is Graham Ross Wilkinson and I am a resident of Queenstown. I hold qualifications of B Com and MBA and I am the sole director of Brecon Street Partnership Limited.
2. I have been involved in property since the mid 1980's and have developed timeshare resorts, land subdivisions, apartment blocks, hotels and retirement villages. Currently I am building retirement villages in Auckland, the Bay of Plenty and Christchurch and also have involvement in various hotels, including Hotel St Moritz here in Queenstown having developed it in 1997, and Sofitel Queenstown having become involved in 2008.
3. Around 2006/2007, I identified 34 Brecon Street as having some absolutely unique characteristics of any parcel of land in Queenstown, which eventually led me to purchase a 75% interest in the company that owns the site.
4. These characteristics include its size allowing the potential for some development scale but more importantly, its unique location. There is nowhere else in Queenstown where 600,000 odd people go directly past almost an acre of land, every year on the way to Queenstown's iconic tourist attraction, Skyline Gondola and yet be only a few minutes away from the centre of town.
5. Further, the site has views to Coronet Peak, Remarkables, Cecil and Walter Peaks, and with some height, the Lake Wakatipu itself.
6. Due to the large mountains behind the site, there is no real potential to shade any neighbours while having the cemetery directly behind means the site it does not obstruct the views of any Queenstown resident but it does mean that in summer, the rear of the site still receives some sun, as opposed to sites further along the toe of the Ben Lomond Reserve.
7. The scale of Ben Lomond Reserve reaches its zenith directly behind the site ensuing that any building would be absorbed into the background and would mitigate any visual intrusion from virtually any viewpoint.
8. Now today, although in 2007 I was unaware of exactly what might happen in the area, as a result of PPC50 the site will be closer and more accessible than any other town centre hotel to the proposed convention centre.
9. No other Queenstown site offers these combined characteristics.
10. Further, from my development experience, it seemed apparent in 2007 that at some point in time developments in Queenstown would need to include an

increase in height, if it was to avoid continual encroachment on the urban boundaries. This site appeared to be the ideal candidate.

11. After negotiating the purchase of a 75% interest in the company that owned the site in 2007, I conducted some preliminary design work with Warren & Mahoney around a mixed use commercial and accommodation model [potentially either residential or tourist based] as referred to in David Gibb's evidence.
12. At the time, I received support from the QLDC urban design team and consequently was not surprised to read in the Queenstown Town Centre Strategy December 2009 report, section 8.12:

*"It is noted that this area contains some of the few sites large enough for a moderate sized hotel remaining in the proximity of the town centre. This area may be appropriate for tourist related activated and visitor accommodation and is being considered in Council's study on areas which may have potential for greater development of height".*

13. While the design of that conceptual building may or may not be relevant today, the concept was a high quality, high density, character building in the nature of other recent Queenstown landmarks such as Steamer Wharf or Amisfield. With the Gondola just across and up the road and a steady procession of tourists up Brecon Street, the potential existed to "bookend" Brecon Street and rectify the very temporary appearance that the area currently has.
14. Unfortunately the GFC intervened before the concept could be developed further but I was confident that the features of the site would enable a revisiting of the concept in the future and retained ownership to wait for that time to arrive.
15. Consequently, when the genesis of PPC50 was first advertised, I was disappointed to discover that 34 Brecon Street was not included in the first iteration when the site clearly fitted in the overall "Lakeview District". After contacting the Council, leading to a meeting of myself and various consultants on 25 July, it was readily agreed that 34 Brecon Street should have been included and provided that the same Council consultants who had worked on the original Lakeview proposal, prepared their reports, then it would be. However, even at this first meeting, I was told by Council consultants that they would be recommending 12m as the height limit for the site. I suggested that this aspect might be better determined by experts rather than Council Officers.
16. After I had engaged the consultants, I was subsequently placed with ultimatums around the height that the site should be designated for. In particular, the Council Development Manager, Mr Speedy ran me on 15 August and advised that

unless I agreed to a 12m height recommendation on 34 Brecon Street, including binding future successors and not objecting to any proposal by Council for Council owned land, then my site would be left out of PPC50. Various letters to this effect were subsequently received, and ignored by me, and eventually the site was included although only at the 12m level despite the obvious benefits that a higher height would have for both this site and Queenstown in general.

17. I do not have a lot more to say about this site and PPC50. Clearly it is in my interests to have the Plan Change successful with the business advantage that a convention centre will bring to both this site and other property I hold an interest in.
18. However, first and foremost, this site is one of Queenstown's best, if not the best site for a hotel, or high density residential accommodation, or some moderate commercial activity or a mixture of all three. To consign it to 12m would simply be a lost opportunity which in my opinion has no logic or fairness, especially when consideration is given to what is proposed on other similar, albeit inferior sites in the area.

**Graham Wilkinson**

Director

Brecon Street Partnership Limited

21 November 2014