

**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 15 January 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. My client, Brecon Street Partnership (**BSPL**) has asked me to produce this report addressing additional urban design matters that have been raised by Council in its supplementary evidence, to support their submission lodged for PC50, submitter No 50/10.
4. This evidence is supplementary to my primary evidence which was submitted on 23 November 2014 and was presented before the Commissioners at the hearing held on 24 November 2014.
5. To prepare this evidence I have read:
 - a. The supplementary urban design evidence of Mr Clinton Bird;
 - b. The supplementary evidence of Mr Doug Weir;
 - c. The supplementary RMA evidence prepared by Mr Munro.

Scope of Evidence

6. My evidence in these proceedings focuses on the following matters:
 - a. FH + Populous's recommended location for the Convention Centre downplays the importance of the proximity to Queenstown Town Centre
 - b. Further examination of the shadow impact of 34 Brecon Street at the proposed 24m height
 - c. Further examination of the most significant public view-shaft from the cemetery

FH + Populous's recommended location for the Convention Centre downplays the importance of the proximity to Queenstown Town Centre

1. I have carefully read though Mr Weir's evidence as well as the '*Queenstown Lakeview Development Masterplan*' (Appendix B in Mr Weir's evidence report) and am particularly concerned with their selection rationale for the location of the Convention Centre.¹
2. On page 11 in Mr Weir's evidence, Figure 8 shows 3 locations have been considered as options for the Convention Centre site.
3. Mr Weir then explains the site selection rationale began with Location 3. He states the '*sole advantage of this site (Location 3) is its proximity to the Queenstown Township Centre*'. He went on to discount the merits of Location 3 based on his perception of the difficulty of access and lack of capacity to site the Convention Centre in a future expanded form. I do not agree that Location 3 should be discounted in this manner as there is ample size of land available to the north of the extended Isle Street.
4. In my opinion, the close proximity to the town centre is one of the most crucial factors to be considered when locating the Convention Centre. Without a doubt, the Convention Centre has the potential for a major contribution to the vitality of the town centre and that can be only achieved if it's within easy-walking distance. I do not accept Mr Weir's contention that their recommended location meets that criteria.

Further examination of the shadow impact of 34 Brecon Street at the proposed 24m height

¹ FH+ Populous' analysis (p25, Queenstown Lakeview Development Masterplan) has drawn the conclusion that Location 1 is the 'Recommended Option' and differentiate Location 2, and Location 3 as 'Not Recommended'.

5. I have noted that in Mr Bird's supplementary evidence he has commented that the shading analysis used in my primary evidence *'ignores and fails to consider the shading effects on the Isle Street and Lakeview subzones to the south and west...'*
6. I don't accept this criticism. The shadow diagrams clearly depict what the effect is on the surrounding sites. I considered the effect to be less than significant.
7. However, to further address this important issue in order to assist the Panel, I have conducted two additional studies (Study A and B in **Appendix C and B**) to examine the effect of the shading from the development of the site. That has revealed what appears to be significant errors in FH's shadow diagrams and in Mr Bird's analysis, they are;
 - a. The placement of a building on Cemetery Road (**Appendix A- Diagram 2**)
 - b. Overlooking the shadow impact cast by the proposed building on the Campground (**Appendix A- Diagram 3**)
 - c. Random placement of the buildings, disregarding the site context such as existing trees and topography, as well as NOT addressing Brecon Street as required by PC50. (**Appendix A- Diagram 4**)
8. In the process of my analysis, it is established that the diagram for 10am June 21 (mid-winter) shows the greatest shading effect to the surroundings. This is informally referred to as the 'worst case scenario' and was used in the 'like-for-like' comparison with FH's analysis in my Study A (**Appendix B**). In my opinion, the shading effect for the above mentioned timing is not as adverse as has been found by Mr Bird.
9. Study A (**Appendix B**) adopted the placement of building blocks as per FH's analysis. This has been done so an 'apples-for-apples' comparison can be made with FH's analysis. I do

however consider that FH's building placement does not seem to hold any logic as above mentioned. For example, the blocks they placed on 34 Brecon Street do not address Brecon Street as required by PC 50. FH's building placement creates an unnecessarily negative impression of the shadow effect cast from the site.

10. I detailed the difference between my shadow diagram analysis and FH's in **Appendix B**.
11. Study B (**Appendix C**) adopted the placement of buildings on 34 Brecon Street as per my primary evidence. My building blocks have been designed to the perimeter to define the public realm. It is 24m high with a 17m set back on the boundary next to the Cemetery. It is at 70% site coverage with lane ways between buildings for permeability.
12. Additionally, I have modelled the existing buildings on the Campground (a mix of holiday apartments, cabins and a maintenance workshop), south west of 34 Brecon Street.
13. In my opinion, it is very important to analyse the shading effect on the existing context as well on the future condition. To my knowledge, several of the campground building are recently constructed and anticipated to remain for some time yet.
14. As seen in **Appendix B and C**, each diagram comes with commentary which clearly describes what the diagram is showing and compares it with FH's analysis.
15. The shadow diagrams show that all adjacent buildings are exposed to sun from 10am (**Figure 1- Appendix F**), even on the winter solstice on 21 July. In my opinion they are not significantly adversely affected because six of the seven buildings will have access to sun by 12pm, which is an important time of day for sunlight as it is a common time for people to take a lunch break.

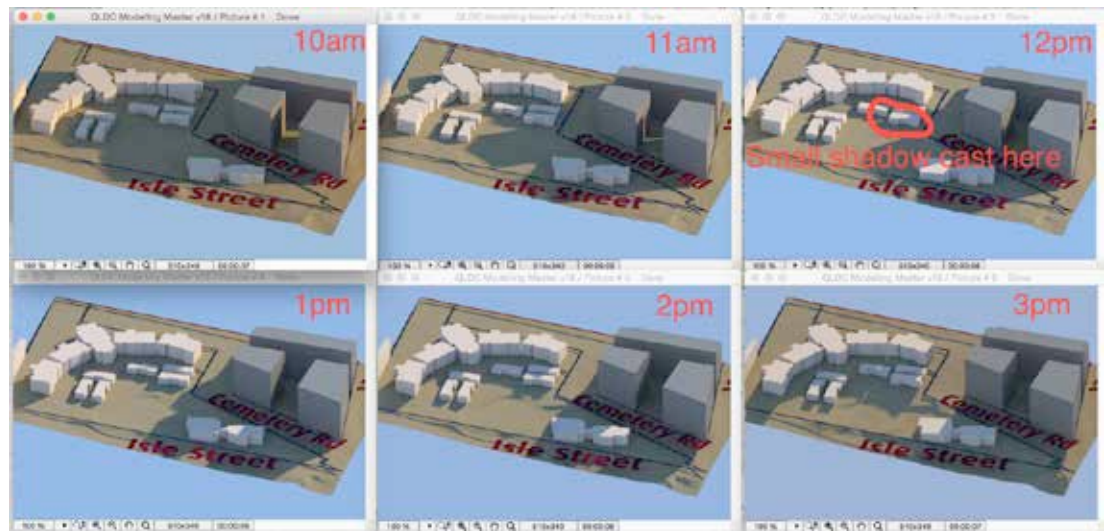


Figure 1: Campground Shadow Analysis on June 21

16. To obtain clarity on why there is a difference between FH's and my shadow diagram analysis, I have also included a 'step-by step' methodology statement (**Appendix D**) which further explains the techniques of how the shadow diagrams were produced. I am confident the methodology used in producing my shadow diagrams is correct.

Further examination of the most significant view-shaft from the cemetery

17. I have read Mr Bird's evidence with regards to the importance of preservation of views from Queenstown Cemetery. Mr Bird has chosen 4 photographs from the website 'Flickr' and used them in his evidence to support his points regarding 'Views from the cemetery'.
18. Mr Munro's evidence discusses the shortcomings of the technique that Mr Bird has employed. I agree with Mr Munro. However, I also note that three of the four photographs selected by Mr Bird in fact support the contention within my primary evidence that the most significant public view-shaft from the cemetery is towards Queenstown Hill and the Remarkables, not towards Cecil Peak. (Refer to **Diagram 5**).
19. The primary view-shaft will not be affected to any significant extent by the development of 34 Brecon Street because it is to the west of the preferred view shaft.

Diagram 5: Aerial photos showing visitors' primary view-shaft from the cemetery



19. I have further analysed the view-shaft by taking a photography (**Appendix E- Diagram 6**) from the same view point as in Mr Bird's evidence (FH's perspective 2). I determined the amount of the most significant view (ie. to the Remarkables) blocked by the development is minimal. I also want to highlight that what is captured by camera can hardly portray the wide view one would experience as a visitor on site.

Conclusion

20. I stand by my statement that the close proximity to the town centre is one of the most crucial factors to be considered when locating the Convention Centre. As it stands, the proposed masterplan has overlooked this particular aspect, and this could result in a less successful outcome for the PC50 area and beyond.
21. From the analysis outlined in this report, I continue to support BSPL's submission on PC50 and the relief sought.

23. In my opinion, Lakeview and 34 Brecon Street present a rare opportunity to realise the aims set out by PC50 for urban expansion within the natural boundary. These sites should not be under utilised.

A handwritten signature in black ink, reading "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,
15 January 2015