

**Before the Expert Panel appointed
under the Fast-track Approvals Act 2024**

Under

the Fast-track Approvals Act 2024

And

In the Matter of

an application for approvals by Mt
Iron Junction Limited to develop 250
medium to high density residential
dwellings, a childcare centre, a retail
building, a café, reserve areas and
recreation amenities

**Statement of Evidence of
Sam Connell on behalf of
Mt Iron Junction Limited in response to
comments made under Section 53**

Architecture

Dated: 26 June 2026

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lane neave.

INTRODUCTION

1. My name is Sam Connell.
2. I am an architectural designer and director of Figure & Ground. My qualifications and experience are set out in the Code of Conduct Table provided to the Expert Panel on 26 June 2026.
3. This statement is given as part of Mt Iron Junction Limited's (**MIJ** or **Applicant**) response to comments on the Mt Iron Junction Housing Scheme (**Project**) made under Section 53 of the Fast-track Approvals Act 2024 (**FTA**). This statement responds to architecture-related comments raised by Gordon Lang and Janet Lang [REDACTED], [REDACTED] Elizabeth Anne Steven on behalf of CM Morgan and JC Morgan Family Trust, at [REDACTED], as well as the comments raised by the Queenstown Lakes District Council (**QLDC**).
4. My original findings are provided in the Architectural Plans (Appendix C & C1) and Architectural Renders (Appendix C2) of the substantive application.
5. This statement should be read in conjunction with the Urban Design and Landscape Masterplan (Appendix B1) and the Landscape Visual Assessment (Appendix D1), prepared by RMM.
6. I have prepared this statement in the limited time available for the Applicant to respond to comments under the FTA. If the Panel requires elaboration on any matters raised, I am available to provide further information on request.
7. Although this is not an Environment Court proceeding, my confirmation of compliance with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023 is included in Appendix Seven (Expert Confirmation of Compliance with Code of Conduct) of the Legal Overview submitted as part of the substantive application.

SPECIFIC RESPONSE TO COMMENTS

Local Authorities

Queenstown Lakes District Council

8. This statement responds to the matters raised at paragraphs 6.10 to 6.14 of the Urban Design Peer Review (Technical Memorandum by Corinne Frischknecht, Senior Policy Planner, QLDC, dated 19 June 2026, being Appendix 4 of QLDC's Section 53 comments (**Urban Design Peer Review**)). Those paragraphs concern the architectural treatment of end walls facing the public realm, and in particular building elevations visible from the state highway network.

9. The peer reviewer's concern at paragraphs 6.8 to 6.11 is based on the visualisation renders. Those renders were produced at an earlier stage of the design process and do not fully represent the final material palette. The architectural drawings package we prepared, reflects the current and refined design and should be the primary reference for assessing end wall treatment. This is found at Appendix C2 of the substantive application.
10. While I do not consider the existing end wall design to present blank or inactive facades in the manner described by the peer reviewer — the current drawings incorporate material variation, cladding profiles, and glazing that provides surface texture and depth — I acknowledge that additional windows on the end walls could further enhance façade articulation and visual interest when viewed from the state highway network.
11. I note, however, that the placement of additional windows on end walls is not without consequence for the internal apartment layouts. End walls in these typologies typically accommodate bedroom headwalls, where the location of windows is constrained by bed placement, wardrobe positions, and minimum clearances. Adding windows to these walls may therefore require corresponding adjustments to windows on other façades to maintain compliant and functional internal arrangements.
12. Any increase in end wall fenestration will be worked through carefully at detailed design stage to ensure internal amenity is not compromised in the process of improving external appearance. I am committed to ensuring that the final design provides for an enhanced façade articulation where practicable, having regard to the limitations outlined.
13. I also note, as acknowledged by the peer reviewer at paragraph 6.5 of the Urban Design Peer Review, that the QLDC Residential Design Guidelines are targeted at residentially zoned land. The subject Site sits within the Rural Zone and the guidelines are therefore not directly applicable as a regulatory matter. I have nonetheless had regard to them as a relevant benchmark for design quality.
14. The peer reviewer acknowledges at paragraph 6.12 that confirmation of end wall treatment “*could be incorporated in the next stage of design development*” and that a consent condition is an acceptable alternative to providing this information upfront. I support that approach. The end wall design, including any increase in fenestration and any consequential adjustments to other façades, can be confirmed and submitted for QLDC approval at detailed design stage, and I am comfortable with a consent condition to that effect.

Owners and Occupiers of Adjacent Land

Elizabeth Anne Steven on behalf of CM Morgan and JC Morgan Family Trust

15. This statement responds to the architecture-related matters raised in the Landscape Comment of Elizabeth Anne Steven, dated 19 June 2026, prepared on behalf of the CM Morgan and JC Morgan Family Trust (the Morgan Comment). Ms Steven raises concerns about the architectural typologies, materiality, and built form aesthetics of the Project, principally in the context of landscape effects. I address each of those matters below from the perspective of Figure and Ground as the designers.

Architectural Typologies and Materiality (Morgan Comment Paragraphs 39 and 43)

16. I note at the outset that Ms Steven's comments on architectural typologies and materiality are offered from a landscape architecture perspective, focused primarily on how the built form reads in views from public roads and as foreground to Mt Iron. I respect that perspective and engage with it genuinely. However, the design decisions she questions also reflect a range of considerations beyond visual appearance from public vantage points, including internal amenity, structural efficiency, housing affordability, and the functional requirements of the typologies. These are matters properly within the domain of architectural design.
17. Ms Steven characterises the three-storey apartment blocks as "*slick*" and suggests they would be more at home in a core built-up urban area such as Three Parks. I do not accept that characterisation. The apartment typology has been designed with a palette of materials that includes brick veneer, shiplap timber weatherboard, vertical cladding, and corrugated cladding. This is a deliberately varied and textured material palette that draws on vernacular building traditions common throughout the South Island and is not, in my view, "*slick*" in character. The massing of the apartment blocks has also been broken down through variation in setback, balcony expression, and changes in cladding material at different levels.
18. Ms Steven specifically criticises the use of pale-coloured Roman brick at the scale proposed. I acknowledge that the choice of brick as a cladding material requires careful consideration in this context. Roman brick in an off-white or pale tone is a low-reflectance, matte-finish product that does not produce high visual contrast or glare. It is used at ground-floor level to provide robustness, weight, and a sense of permanence appropriate to a mixed-use gateway development. The upper levels of the same buildings use recessive timber-based cladding which softens the overall appearance of the buildings when viewed from distance. Notwithstanding this, I am open to revisiting the specific brick colour at detailed design stage. Moving toward an earthy-toned brick would better align with the local vernacular palette and sit more comfortably within the natural tones of the surrounding landscape and the Mt

Iron backdrop. I consider this a reasonable refinement that could be incorporated without affecting the structural or functional role of the material.

19. Ms Steven states at paragraph 43 that the built forms in foreground views do not have an architectural form and aesthetic that complements the distinctive, rugged natural character of Mt Iron, and recommends at paragraph 68(f) that the architectural typologies be reviewed to ensure a more recessive and subservient built form aesthetic. I accept that the relationship between the built form and Mt Iron is an important design consideration in this gateway location. However, I do not consider that “*recessive and subservient*” necessarily means low-density standalone forms. The material palette, particularly the use of natural timber cladding, muted earthy tones, and textured surfaces, is intended to respond to the natural character of Mt Iron rather than contrast with it. The landscaping strategy, including proposed planting along the state highway boundaries, will further soften the built form over time.
20. Ms Steven notes at paragraph 43 that the zig-zag roof form of the terrace housing is prominent in Visualisation 12.1. The stepped and varied roofline of the terrace typologies is a deliberate design outcome, intended to avoid a monotonous flat or uniform ridge line and to break the massing of the terrace rows into smaller perceived units. I consider this to be an appropriate architectural response for this typology and do not propose to revisit the roof form.

Terrace Housing along the North Boundary (Morgan Comment Paragraphs 40 and 68(k))

21. Ms Steven raises concern at paragraphs 40 and 68(k) that placing terrace housing along most of the length of the long, straight northwest boundary creates a visually incoherent outcome and emphasises an anomalous cadastral edge. The linear arrangement of terrace typologies along the north boundary reflects the Site geometry and the need to maximise the developable area efficiently. The boundary condition is softened through the proposed landscaping along this edge, which will provide screening and visual relief over time. Because of this I consider the current design to be appropriate and do not propose to make changes to the layout or typologies along the north boundary.

Consistency with Ambient Urban Character (Morgan Comment Paragraphs 39 and 68(i))

22. Ms Steven states that the proposed built form typologies share very little in common with the ambient urban character of the surrounding area, which she characterises as low-density stand-alone dwellings with no terracing, repeated forms, grid patterns, or straight lines. She recommends that the built form typologies and spatial pattern be reviewed to better integrate with the ambient urban character.

23. I acknowledge that the proposed development is denser and more structured in its spatial organisation than the surrounding residential fabric. This is, however, a deliberate and appropriate response to the purpose of the Project, which is to deliver a meaningful quantum of housing, including affordable housing, on a constrained Site at a gateway location. A development that simply replicated the stand-alone dwelling pattern of the surrounding neighbourhood would not achieve the housing outcomes for which consent is sought and would not represent an efficient use of the Site.
24. Nonetheless, I accept that the design should make reasonable efforts to acknowledge the character of its setting. The material palette and building scale across the typologies have been calibrated with this in mind — modest individual building footprints, predominantly one and two storey forms with three storeys limited to specific typologies, natural and textured cladding materials, and varied rooflines. These are the attributes Ms Steven herself acknowledges at paragraph 39 as being consistent with the ambient character at a high level. I consider these represent a genuine attempt to integrate with the setting while delivering the required housing outcomes.

Gordon Lang and Janet Lang, [REDACTED]

25. Gordon Lang and Janet Lang own and occupy [REDACTED], which adjoins the Site to the northwest. Both have filed separate comments opposing the Project. The architecture-related concerns raised across their two submissions are addressed below. Comments directed to planning, traffic, infrastructure, stormwater, and other non-architectural matters are addressed by the relevant experts.
26. I do not propose changes to the plans in response to the comments received. The responses below explain why the architectural design as proposed is appropriate. However, I do acknowledge that there is potential to reposition typologies within the Site to reduce height impacts at the most sensitive boundary interfaces, as discussed further below.

Building Height, Bulk and Boundary Setbacks

27. Both Gordon Lang and Janet Lang raise concerns about building height, bulk, and boundary setbacks. Gordon Lang submits that the proposed building heights exceed what would normally be expected in a rural residential environment, creating visual dominance, reduced openness, increased shading, loss of privacy, and an increased sense of enclosure for neighbouring properties. He further submits that the proposal includes breaches of standard boundary setbacks established to protect neighbouring properties. Janet Lang similarly raises concerns about taller buildings being visually dominant from surrounding properties, roads and public

areas, with increased shading, reduced privacy, and buildings appearing out of scale with existing development.

28. I do not agree that changes to building heights or setbacks are required. As set out in section 3.1.2 of the Applicant's Residential Development Framework, the design outcomes for the residential units are intended to be similar to Medium Density Residential Zone (**MDRZ**) outcomes under the Proposed District Plan (**PDP**), with MDRZ performance standards proposed to apply as conditions of consent. It is important to note that the application does not rezone the Site or claim it is within the MDRZ — rather, it proposes that MDRZ outcomes provide the appropriate design benchmark for this scale of development.
29. The Langs' property sits within the Large Lot Residential A zone, which has different height and setback expectations from those proposed for the Project. The comments effectively call for the Site to be designed to the standards of the neighbouring zone rather than to the standards appropriate for the proposed development typology. The purpose of the application is precisely to enable a different and more intensive form of development than the rural zoning would otherwise permit, in order to address Wānaka's identified housing need.
30. The building typologies along the northwest boundary — the T2 (5m tall) and T3 (7.7m tall) terrace units — have been designed with modulated facades, pitched roof forms, and a landscaped interface. Proposed planting within the Site along the northwest boundary will provide a degree of screening and softening over time. I am satisfied that these measures, together with the design of the typologies themselves, appropriately address the interface with the neighbouring properties.
31. Regarding the boundary setback breaches referred to by Gordon Lang: the breaches noted in the application reflect the departure from rural zone setback rules that is inherent in the proposed development typology. These breaches have been assessed in the substantive application, and I submit they are appropriate given the nature and purpose of the Project.

Scale, Density and Incompatibility with Rural Residential Character

32. Gordon Lang submits that the scale, density, and intensity of development are inconsistent with the spacious, low-density environment of the surrounding rural residential area, and that the proposal effectively introduces urban-scale development into a rural residential setting. Janet Lang similarly raises concerns about excessive density, with approximately 250 dwellings on less than 6 hectares, noting that many existing residents purchased their properties specifically to avoid high-density living.

33. I acknowledge that the Project represents a significant change in character from the surrounding rural residential environment. This is intentional. The Project has been designed to deliver a regionally significant volume of medium and high-density residential housing in order to address the acute housing affordability and supply challenges facing Wānaka. The housing typologies — comprising 20 x 1 bedroom, 160 x 2 bedroom, and 70 x 3 bedroom units — have been specifically designed to provide smaller, more affordable residential options that are not currently being supplied by standard development methods in the district.
34. I submit that the appropriate question for the Expert Panel is not whether the Project is consistent with the existing rural residential character of the surrounding area — it is not, and is not intended to be — but whether the Project's effects are acceptable having regard to its purpose and the relevant statutory framework. That assessment is addressed in the planning evidence and the relevant expert reports forming part of the substantive application. From an architectural perspective, the scale and density of the Project have been carefully calibrated within the MDRZ performance standards proposed as conditions of consent.

Visual Amenity, Landscape Character and the Gateway to Wānaka

35. Both commenters raise concerns about adverse effects on landscape values and the visual character of the gateway to Wānaka. Gordon Lang submits the development would urbanise a prominent location and diminish the visual openness that contributes to the area's rural-residential character, and that cumulative effects of high-density housing, increased building heights, and reduced setbacks would fundamentally alter the appearance of the area. Janet Lang raises concerns about urbanisation of a prominent gateway Site, loss of open landscape character, reduced visual connection between Mt Iron and surrounding rural land, and adverse effects on the sense of arrival into Wānaka.
36. These concerns relate primarily to landscape and visual amenity effects, which are addressed in the Landscape Visual Assessment (Appendix D1 of the substantive application) and the landscape evidence filed with this response. From an architectural perspective, I note the following.
37. The architectural design of the Project has been developed with specific regard to its prominent gateway location at the junction of SH6 and SH84 and the visual relationship with Mt Iron. The building typologies have been designed to provide visual variety and articulation rather than a uniform mass, with a palette of materials and colours selected to be contextually appropriate. The heights of buildings are modulated across the Site, with taller elements located away from the highway boundaries where practicable.

38. I do not accept that the architectural design of the Project would have unacceptable adverse effects on the visual character of the gateway to Wānaka. The Landscape Visual Assessment submitted as Appendix D1 of the substantive application concludes that visual effects are within acceptable limits. I maintain the plans as lodged and no changes are proposed in response to these comments.

SUMMARY

39. In summary, I have carefully considered the architecture-related comments filed by three parties: QLDC, Elizabeth Anne Steven on behalf of the CM Morgan and JC Morgan Family Trust, and Gordon Lang and Janet Lang of [REDACTED]. I submit that none of these comments identify deficiencies in the architectural design that would require changes to the plans as lodged.
40. Regarding the Urban Design Peer Review, the concerns raised relate to the architectural treatment of end walls visible from the state highway network. I do not consider the existing design presents blank or inactive facades, as the drawings incorporate material variation, cladding profiles, and glazing. Nonetheless, I acknowledge that additional fenestration could further enhance façade articulation and I am committed to working through any increase in end wall glazing carefully at detailed design stage to ensure internal amenity is not compromised. I am comfortable with a consent condition requiring confirmation of end wall treatment at detailed design stage, as suggested by the peer reviewer.
41. Regarding the JC Morgan Family Trust Comments, Ms Steven raises concerns about the architectural typologies and materiality, the prominence of the terrace housing along the north boundary, and the consistency of the built form with the ambient urban character. I do not accept that the material palette is “*slick*” or out of place — it draws on vernacular traditions common throughout the South Island and responds to the natural character of Mt Iron through the use of timber cladding, muted tones, and textured surfaces. I am open to revisiting the specific brick colour at detailed design stage toward an earthy-toned alternative. The linear arrangement of terrace typologies along the north boundary is appropriate given the Site geometry and will be softened by proposed landscaping over time. I accept that the Project is denser than the surrounding residential fabric, but consider this a deliberate and appropriate response to the Project’s housing objectives.
42. Regarding the comments of Gordon Lang and Janet Lang, they raise concerns about building height, bulk, boundary setbacks, scale and density, and visual amenity effects on the gateway character of Wānaka. I do not agree that changes to building heights or setbacks are required. The design has been calibrated against MDRZ performance standards proposed as conditions of consent, which represent the appropriate benchmark for this scale of development. The T2 and T3 terrace

typologies along the northwest boundary have been designed with modulated facades, pitched roofs, and a landscaped interface that together appropriately address the neighbouring properties. The broader concerns about density and gateway character are addressed in the Landscape Visual Assessment and planning evidence, which I support.

43. The design has been developed by an experienced architectural team with specific regard to the Project's context, the MDRZ performance standards proposed as conditions of consent, and the visual relationship of the Site with Mt Iron and the SH6/SH84 corridor. The Project intentionally delivers a more intensive form of development than currently exists in the surrounding area in order to meet Wānaka's identified housing needs. I submit this is appropriate and maintain the plans as lodged.

A handwritten signature in black ink, appearing to read 'Sam Connell', with a stylized, cursive script.

Sam Connell

26 June 2026