

Attachment B: Te Pūtahi Ladies Mile Planning Provisions - feedback received email

I am attaching this from the Lake Hayes Estate and Shotover country community association as I totally agree with everything they have stated for the proposed plans

LAKE HAYES ESTATE AND SHOTOVER COUNTRY COMMUNITY ASSOCIATION (LHESC)

26 May 2021

To Whom It May Concern

The Ladies Mile master plan and proposed plan change is opposed while key issues remain outstanding. We would like to identify also that while the Council has pushed ahead with this master planning process, the community has never been in support of the Council's master planning of development at Ladies Mile, particularly when this is paid for by ratepayers and has been prioritised above other areas within the district with better ability to absorb development.

Our community has now organised two public meetings to express our concerns to the Council. The following is collated by input from the LHE and SC Residents.

It is important that these concerns are addressed. To date they have not.

Our key concerns with the proposed development at Ladies Mile are as follows:

- **Effects on transport congestion.**
- **Effects of residential development in greenfields sites that is physically separated from urban centres (and the ongoing effects on traffic)**
- **The effects on intensification in existing centres by enabling further sprawl; i.e. enabling greenfields development reduces demand for intensifying within the existing centres)**
- **Use of prime agricultural land for residential development instead of intensifying existing urban centres**
- **Potential for residential development without the infrastructure and community facilities that are needed for the existing community.**

We request that the Ladies Mile is managed via a deferred zoning. As such, any up-zoning will be deferred until such time as:

- **Urban centres are intensified (Queenstown, Arrowtown and Frankton).**
- **Traffic solutions are found that meet the needs of the existing community.**
- **There are community facilities established that provide for the existing community and any future growth.**
- **There is certainty that a high school and primary school will proceed.**

The following provides further explanation of our concerns.

Transport

Based on the feedback to our queries, we believe that the transport effects of increased residential development at Ladies Mile can not be mitigated. The level of congestion currently experienced will, based on the proposal, only get worse. For this reason the community is opposed to any residential development at Ladies Mile. The proposal relies on a mode shift of 40-50%. We recognise that there needs to be a mode shift and would like to see incentives for modal shift occurring now in order to see what is realistic or achievable in easing the existing commuter congestion. Examples provided by the traffic expert of places where there has been significant mode change are not in New Zealand, therefore we question their relevance; a mode shift has not occurred in Auckland or Christchurch and we question whether it will happen in Queenstown? We are aware of the difficulties faced given the different roles of Waka Kotahi, ORC and QLDC. We are concerned that these organisations are not working together to reach solutions.

It is our submission that before Council considers enabling residential development at Ladies Mile, solutions to the existing traffic issues must first be resolved. This is a wider issue than the existing residents within Lake Hayes Estate and Shotover Country, it is an issue resulting from the wider development and growth in areas such as Cromwell, Wanaka and Gibbston. It is not reasonable to pin the blame on our community. If traffic is to be managed, then regional public transport initiatives must first be in place and proven to work.

Ladies Mile is a rural site that is physically separated from any town centre and its associated services and employment, the plan change is attempting to suggest that it can create a live-work environment but based on our experience with previous local subdivisions, achieving commercial development is always difficult. In reality Ladies Mile will also become a commuter suburb.

We disagree with those saying that a new bridge would only move the problem up the road. When heading into Frankton the roads turn off in many directions (Glenda Dr, Remarks Park, Qtn Central, 5 Mile, Jacks Pt and Downtown Queenstown. And the opposite is the case at the end of the day when you have all these locations merging to get back over the bridge. If NZTA has no budget to upgrade the bridge then QLDC cannot approve a plan that adds extra traffic to the congestion creating further problems. We have requested that the Council survey our community, and Cromwell, Arrowtown and Wanaka and find out where they are travelling to, and what solutions may then work. It is preferable to use information on the ground rather than rely on traffic models that even the traffic expert admits he doesn't understand. Queenstown's situation is distinct; we have different drivers and we live here for different reasons (than for instance why someone would live in central Wellington). Comparing Queenstown to the likes of Aspen also does not work because we have different legislation and governance structures.

The Consortium has provided no assurance that traffic effects can be adequately managed. Our community is already affected by traffic congestion and this will only get worse. For this reason we oppose the proposal to develop Ladies Mile.

Car parking

We are concerned by the limited car parking provided in the master plan. Ladies Mile is not located in a town centre, and it will be extremely difficult for a town centre to establish here, maximum car park rules only work in town centres where there is existing employment and

services. Remarkables Park and the existing Queenstown Town Centre are good examples where such rules could work. This is because people can live in these locations without the need of a car. Lake Hayes Estate and Shotover Country currently attracts families and "tradies" who rely on cars and work vans. Further, it needs to be recognised that we live in the lakes district, there are adventure activities, walks, biking, and sites to see in so many random places not to mention kids sports/activities. Alongside that a significant proportion of families also own some kind of recreational vehicle such as boat, caravan, motorbike which also need parked. The pretty pictures of green will be covered with cars backed up on kerbsides around the neighbourhood. We do not agree with the masterplan as adequate car parking is not provided.

Active Travel

In order to encourage active travel a more direct commuter route needs to be established. This was not shown on the masterplan. Long detours across the old bridge does not encourage active travel or modal shifts. Building a new active travel bridge or connecting one under the existing bridge may help achieve more mode shift but this is not shown on the masterplan. In terms of connections, and contribution towards active travel, there are no linkages proposed up Slope Hill, or through to Lake Hayes. Therefore based on the above lack of detail to increase active travel we oppose the proposed Ladies Mile masterplan.

National Policy Statement – Urban Development (NPS-UD)

In our opinion the proposal to develop Ladies Mile is contrary to the objectives and policies of the NPS-UD.

The objectives and policies refer to 'urban environments' and therefore they do not actually apply to Ladies Mile. Ladies Mile is currently rural. However, in comparison, Queenstown, Frankton and Arrowtown are urban areas. It is these areas that should be addressed first, because they contain the services and infrastructure to support intensification. It is these urban areas that should be accommodating intensified development. By doing so these issues of transport, effects on emissions, are better resolved.

In terms of Ladies Mile, while it could be said that the master plan proposes intensification from its current zoning, it is a significant change in zoning from one purpose to another; i.e. from rural lifestyle to high density residential. It is more a fundamental change than intensification. Further, as above, it is not intensifying an urban area, but creating a new urban area.

The following provides our brief assessment of the proposal against the relevant objectives and policies of the NPS-UD

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

The Ladies Mile is not an urban environment and its development, as currently proposed, does not enable our community to provide for their social, economic and cultural wellbeing.

A key issue is of course transport. It is our understanding that the level of congestion experienced now is a best case scenario moving into the future. That is because even if 50% of the existing community and 50% of the new residents within Ladies Mile use public transport or alternative modes, then the level of traffic remains the same as it is now. This reduces our community's wellbeing significantly.

Further, there is no ability to control the traffic movements from Wanaka and Cromwell. These towns are growing, and the number of people commuting to Queenstown is increasing year by year.

Objective 6: Local authority decisions on urban development that affect urban environments are:

integrated with infrastructure planning and funding decisions; and

strategic over the medium term and long term; and

responsive, particularly in relation to proposals that would supply significant development capacity.

Because of the traffic issues Ladies Mile does not represent integrated management with infrastructure planning.

Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.

Providing for future growth in a greenfields location that is physically separated from services and employment is contrary to objective 8. Ladies Mile provides productive soil, and is flat and (mostly) sunny. While the plan change proposes some commercial uses so that there may be some live-work created, to achieve a live-work environment requires the creation of a new town centre. This is instead of intensifying residential development in existing centres that already have those services.

What plans are in place for ensuring developers are doing their bit to overt climate change ie what systems will be rewarded or enforced such as solar or wind power?

Vision 2050 - Our district is a place where our quality of life is enhanced by growth through innovation and thoughtful management"

Unless there are incentives for innovation (green roofs, green walls, tennis courts/pools on roofs, solar, wind etc) we are concerned the developers will continue to build to minimum and uninspiring standards. QLDC have the opportunity to reward innovation that supports "Live. Work, Play" and climate change but there is no indicated to this effect on the masterplan.

Wakatipu Basin Land use Study

The Wakatipu Basin Study identified that there are two areas where comprehensive planning should be undertaken. At paragraph 1.26 it identifies two areas, being Arrowtown and Ladies Mile. It is queried why focus has only been applied to Ladies Mile? Is it developer driven?

Extract from PDP:

Ladies Mile is currently zoned Rural Lifestyle Zone with a minimum lot size of 2ha. The description in the PDP reads:

The Rural Lifestyle zone provides for rural living opportunities with an overall density of one residential unit per two hectares across a subdivision. Building platforms are identified at the time of subdivision to manage the sprawl of buildings, manage adverse effects on landscape values and to manage other identified constraints such as natural hazards and servicing. The potential adverse effects of buildings are controlled by height, colour and lighting standards.

Many of the Rural Lifestyle zones are located within sensitive parts of the district's distinctive landscapes. While residential development is anticipated within these zones, provisions are included to manage the visual prominence of buildings, control residential density and generally discourage commercial activities. Building location is controlled by the identification

of building platforms, bulk and location standards and, where required, design and landscaping controls imposed at the time of subdivision.

The rules provide:

Building height more than 8m= Non Complying

Residential density more than 1 house per 2ha= Non Complying

The proposed rules for the Ladies Mile propose non complying where activities or development are contrary to the Structure plan. That gives no greater certainty than the existing zoning, given that it is the same activity status as what currently exists. As we have identified above, a preferred option is a deferred zoning- enabling Council to freeze development of the land into 2ha lots until such time that capacity is needed.

The Ladies Mile is outside of the Urban Growth Boundary. The urban growth boundary wraps around the existing urban settlements of Frankton, Quail Rise, Shotover Country and Lake Hayes Estate

The relevant provisions are contained within Chapter 3: Strategic directions and Chapter 4: Urban Development. We consider the following of particular relevance:

Policy 3.1.13

Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Queenstown, Frankton, Jack's Point and Arrowtown), Wānaka and where required around other settlements. (relevant to S.O. 3.2.2.1)

3.1.14

*Apply provisions that enable urban development within the UGBs **and avoid** urban development outside of the UGBs.*

Chapter 4: Urban development

Policy 4.2.1.2 Focus urban development primarily on land within and adjacent to the existing larger urban areas and, to a lesser extent, within and adjacent to smaller urban areas, towns and rural settlements.

4.2.1.3 Ensure that urban development is contained within the defined Urban Growth Boundaries, and that aside from urban development within existing towns and rural settlements, urban development is avoided outside of those boundaries.

Policy 4.2.1.5 When locating Urban Growth Boundaries or extending towns and rural urban settlements through plan changes, protect the values of Outstanding Natural Features and Outstanding Natural Landscapes

Ladies Mile is outside the urban growth boundary. Therefore, its change from rural to urban requires an amendment to the UGB. Such a change needs to be assessed against the strategic objectives and policies. It is concerning that this analysis does not appear to have occurred.

Ladies Mile is adjacent to an ONF (Slope Hill) and is in close proximity to Lake Hayes (also an ONF, and extremely sensitive to land use change), and on the entrance to Queenstown. It is a highly valued landscape that will be adversely affected by the proposed level of development. We are concerned that the proposed built form would be visible from the State

Highway as it passes Lake Hayes, and would block views of the Slope Hill outstanding natural feature.

An assessment of whether the Ladies Mile area should remain rural as opposed to becoming urban has yet to be undertaken. That assessment is needed to determine whether it is appropriate to extend the UGB.

Our community has been told by Mr Avery that 'if the developers wish to develop, then Council and the community can not do anything to stop them', then is the council going to stop the developers for obtaining non complying activity consent for development contrary to the master plan?

Recent ORC Submission

We agree with the reasons ORC put forward recently to decline the application for a 12 Lot subdivision at 466 Ladies Mile. We believe these reasons also stand for 200 times more dwellings proposed for Te Pūtahi/Ladies Mile.

[ORC Submission requesting decline of application 466 Ladies Mile](#)

Density

Within the guiding principles which state *“Do density well, provide quality and diverse housing”* it is unclear how the new masterplan provides diverse housing? Although it is marketed as Te Pūtahi which includes the existing LHE and SC, there is very clearly a physical divide in the way of SH6 and the masterplan creates one side of high density and one side as less dense. This divide becomes even more obvious when a further primary school (although needed) is established as this creates two quite different primary school communities – the diversity is no longer shared across the whole of Ladies Mile/Te Pūtahi.

Who is the target market for high density living? Is it younger people - do they want to live so far away from amenities such as supermarkets/bars/cafes/restaurants/ attractions? Is it Families – do families want to live on the 4th floor with half a car park? Is it “tradies”, as this existing area appears to attract but where will they park their work vans? Is it retirees –again would they prefer to live closer to amenities and recreation activities?

We would expect to see an allocation for affordable housing and for the Community Housing Trust to be involved. How do you ensure that developers are contributing to this at an acceptable percentage?

Self Sustained & Connected Communities

Can there really be sufficient amenities within Te Pūtahi to create a self sustained community?

It cannot be self sustaining without a town centre that provides work, live and play options. The commercial area is only really viable for small business owners therefore how much “work” will this really create in this area?

How long will it take for developers/business to want to buy into and set up commercial - they need the population first to sustain a business - therefore we are left with the scenario we have seen in the past - residential comes (a long time) before commercial which equals traffic on the road. We are concerned that the Council can not force developers to construct and operate commercial uses. Even Hobsonville in Auckland has struggled with this, and it has become a commuter suburb. It is based on this lack of trust in both developers and

QLDC to simultaneously develop commercial, community amenities and residential that we oppose this masterplan.

Secondary School

Our community association has been told that the Ministry of Education does not wish to locate a high school in the proposed drawing on the masterplan, and that its preferred location is 516 Ladies Mile. We understand that this is the result of an extensive assessment by the Ministry to determine the most appropriate site.

The community is not opposed to the location of a high school at 516 Ladies Mile, but this is subject to co-location of the high school with community facilities. We believe there is actually significant benefit in such co-location. There is 14ha available, so even if the school requires 8ha, then of that remaining 6ha the community could have community hall/facilities, and could share the sports fields/courts with the School. This would cost-share the construction and ongoing maintenance of sports facilities.

It is our understanding that the high school will be needed by 2030 whether or not Ladies Mile proceeds. There is an opportunity for the Ministry of Education to work with the community to achieve a facility that provides for both the needs of the Ministry and the needs of our existing community, in addition to future communities.

We believe that a win-win solution could be achieved here. We request that the Council and Ministry engages with the community to find a mutually beneficial solution. Providing both education and community facilities is extremely important to our community, and there is an opportunity to achieve both. We support the school at 516 also because it avoids the situation whereby we get more residential development without the promised infrastructure and facilities.

We also note that the community feedback on the three options preferred the location of the High school at 516. Therefore it is odd that there is a suggestion that our community would be opposed to that proposal.

Secondary schooling on Ladies Mile, will potentially ease traffic volume over the bridge and allow a significant number of children to walk and bike to school.

In summary, if the school can co-locate with community facilities at 516 Ladies Mile, then its location at this site is supported. The community supports the provision of a high school and sees benefit in a high school co-locating with community facilities.

Entrance to Queenstown

"We are the place the rest of the world cannot be" quoted from QLDCs own Vision 2050. There are plenty of places in the world where we can sit in traffic jams and see high rises as the entrance to the town/city! How many places in the world can you drive into the town past a picturesque lake, look up to a mountain range on the left (with residential is set back from the main road) and look right to sloping hills, farmland and yet another mountain in the distance?

The Ladies Mile is the entrance to Queenstown, providing high levels of visual amenity. While the quality of the views towards the Remarkables have been reduced because of the retirement village, there still exists views towards Slope Hill, which is an outstanding natural feature. Locating dense, high built form at the foot of Slope Hill will adversely affect the qualities of this landscape.

In ORC's recent submission it also cites Ladies Mile as an area of local significance and we very much agree. "The site is located within the Ladies Mile Corridor between Shotover River and Lake Hayes which is an area of significance for many locals, and is often seen as a gateway into Queenstown. The density of development has the potential to undermine this amenity landscape."

"Welcome to Queenstown - it is unclear how long it will take you to reach your destination after you pass Lake Hayes, but sit in traffic and enjoy the welcoming views of highrise apartment blocks from your crawling vehicle!" Councillors - do you want this to be your legacy??

Lake Hayes/Stormwater

The natural topography slopes towards Lake Hayes. The proposal to integrate stormwater management into the development is supported. However, we remain concerned that the stormwater discharges from such dense development will be difficult to manage. Lake Hayes is so sensitive that extreme care is needed to ensure that there will be no effects on the Lake.

Who will pay for the upkeep of the Lake Hayes track and protection of Lake Hayes with so many more users on its doorstep – is this budgeted?

QLDC Vision 2050

How will QLDC ensure that developers consider and adhere to this?

Everyone can find a healthy home in a place they choose to be - will the housing proposed be at different standards and price points to encourage more people to be able to buy and live in this area? How will this be monitored and enforced?

Our Māori ancestry and European heritage are both reflected and enrich our lives - how are the heritage aspects being preserved and incorporated into the development. How are Māori values and ideology being considered within the masterplan?

Artists and art lovers unite in both dedicated spaces and beyond the boundaries of venues and facilities - where is the art and creativity opportunities within the masterplan? Who is responsible for and pays for this?

Our people and visitors respect the privilege of accessing our rivers, lakes and mountains - Where is the access to key destinations such as Lake Hayes, Slope Hill and Kawarau River going to be? This is not outlined in the masterplan.

Our homes and buildings take the best ideas from the world, but use sustainable, locally-sourced materials - what is the design palette going to be for this area and how is energy alternatives going to be promoted i.e. compulsory solar panels on roofs

Zero waste is just something that we do here - how will composting and recycling work in high density housing?

Our public transport is the cleanest, greenest, innovative choice for district-wide connectivity - will the PT measure up to this statement - for existing commuters, before further development begins?

Active travel is an integral part of an accessible and safe network for all of our people - will the active network be direct, safe and cater for all ages?

Our infrastructure is as resilient as our people - will the infrastructure be designed to withstand an alpine fault quake? Who is responsible for this?

Green Spaces

Green spaces are especially important to the community. The masterplan shows very little detail in the way of exactly what the green spaces, reserves and recreation areas will look like. There is a lack of trust that developers will actually put in place adequate green and

recreational spaces. Is there a decent playground and not just pocket park styles? Shotover Country has nothing (other than a scooter track for 5 year olds) so don't make the same mistakes. Kids need to be able to walk 10 mins or so to a decent playground ideally. Who will ensure that the ample trees and green spaces shown on the masterplan are firstly actually established and secondly continued to be upkeep in the future - once again who pays for this long term?

Conclusion

In conclusion, it is our opinion that the proposal to change the zoning of the Ladies Mile area from rural to a master planned, high density development is flawed. This does not represent intensification; it represents greenfield, dispersed development.

As outlined above:

- Ladies Mile is a greenfields site and is physically separated from services and employment. Whether it provides 1100 homes or 2300 homes, it will increase traffic movements in an already congested environment. Traffic is already causing significant adverse effects to our community's wellbeing. Until such time as the existing traffic issues are resolved, then there should be no further development at Ladies Mile.
- We have taken on board Mr Avery's concerns around existing zoning not being adequate to 'stop developers doing what they want'. We propose a deferred zoning. Any development must be deferred until such time that:
 - Traffic issues are resolved; there must be a workable public transport system in place, and the Shotover Bridge provides four lanes. If these actions are not taken then traffic congestion will only get worse.
 - The school sites are confirmed
 - Community facilities for the existing community are provided, and there is capacity for future development.
 - Existing centres are intensified to accommodate growth.

Until the traffic issues are resolved, the existing community is provided for, and greater certainty provided that the master plan can be achieved, then we oppose the Ladies Mile proposal.

Thank you for the opportunity to submit.

We wish to be heard in support of our submission

Kind regards

Lake Hayes and Shotover Country Community Association

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

**FEEDBACK OF THE 495 LADIES MILE LIMITED PARTNERSHIP
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The 495 Ladies Mile Limited Partnership (LP) are the owners of Lot 2 DP 359142, a 3.3-hectare property adjoining the Frankton-Ladies Mile Highway.

Overall, the 495 Ladies Mile LP **support** the proposed planning provisions and the approach of a Council-led plan variation. The 495 Ladies Mile LP has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - Building Height Plan

2. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

Feedback on Structure Plan – Sections

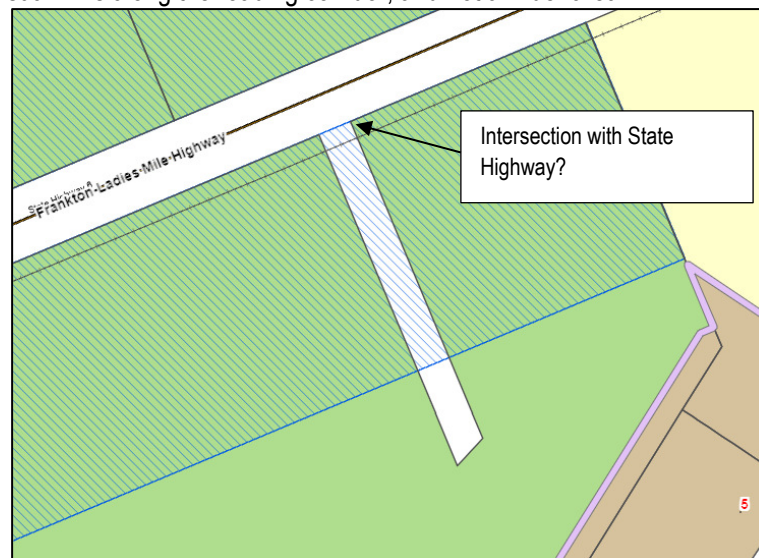
3. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
4. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

5. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how

buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.

6. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
7. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
8. Policy 27.3.17.4b – it is unclear what “Door step play (i.e., play along the way)” means.
9. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
 - Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



10. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
11. Rules 27.6 – having no minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.

12. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.

Chapter 9 – High Density Residential

13. Objective 9.2.9 – this objective is opposed as reads like a policy – “*Development requires...*”. To read like an objective it could be altered to read “Development achieves...”
14. Policy 9.2.9.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
15. Policy 9.2.10.1 – this policy is opposed due to strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
16. Rule 9.4.20 – this rule requires a Sub-Area Spatial Plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
17. Rule 9.5.18 – this rule requires that development “shall be undertaken in accordance with the Structure Plan”. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording is very strict does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
18. Rule 8.5 – Standards – At a high level ‘bulk and location’ controls proposed are considered to enable the built form outcomes conducive to ensuring a wide range of housing types or more affordable housing options (Policy 8.2.12.1).
19. Rule 9.5.24.2 and 9.5.24.3 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45 litre bag is a PB75. A PB45 is 27 litres. This should be clarified.
20. Rule 9.5.36 – this rule is opposed as it could lead to unintended outcomes and delays.
21. 9.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the HDR zoned land.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Blair Devlin', with a long horizontal flourish extending to the right.

Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

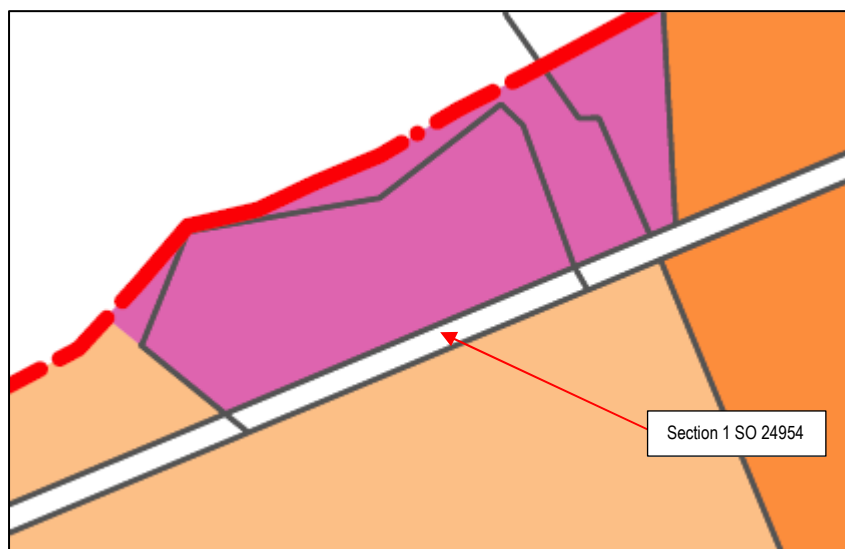
**FEEDBACK OF THE MILSTEAD TRUST
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The Milstead Trust are the owners of Lot 2 DP 463532, a 7.1-hectare property adjoining the Frankton-Ladies Mile Highway.

Overall, the Milstead Trust **support** the proposed planning provisions and the approach of a Council-led plan variation. The Milstead Trust has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and Pinus radiata. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

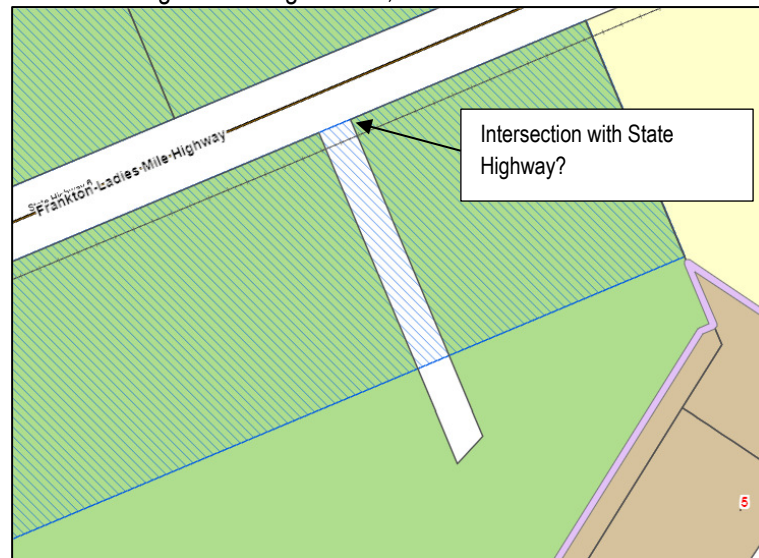
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

25. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
26. Rule 15.5.1.2d – matter of discretion ‘d’, relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
27. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

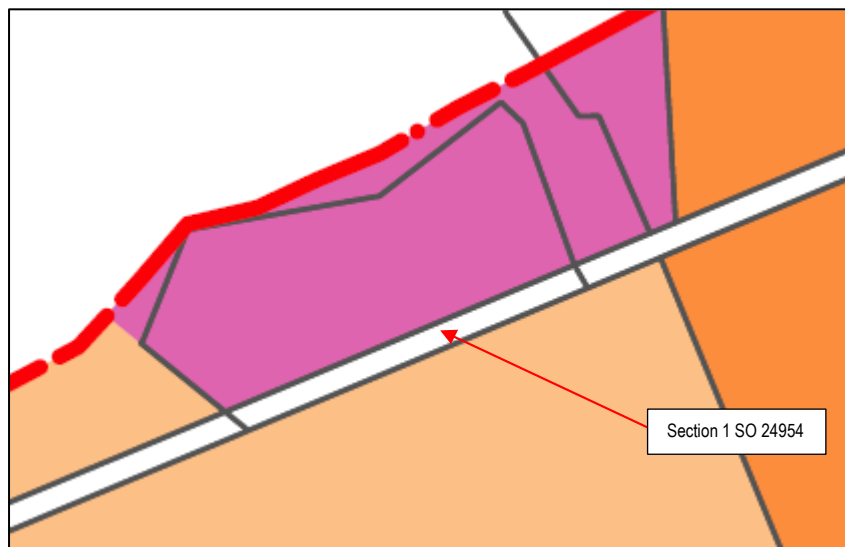
Dear Liz,

**FEEDBACK OF MR LINDSEY TOPP
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

Mr Lindsey Topp **supports** the proposed planning provisions and the approach of a Council-led plan variation. Mr Topp has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and Pinus radiata. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

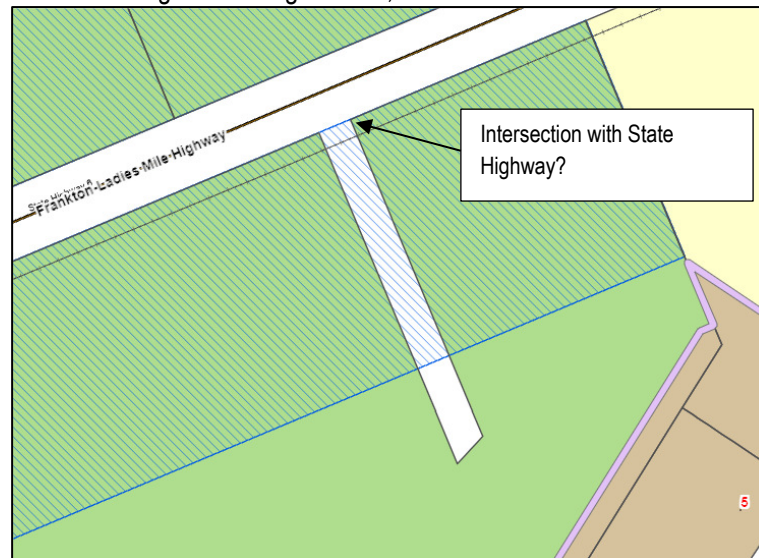
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 9 – High Density Residential

25. Objective 9.2.9 – this objective is opposed as reads like a policy – “*Development requires...*”. To read like an objective it could be altered to read “*Development achieves...*”
26. Policy 9.2.9.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
27. Policy 9.2.10.1 – this policy is opposed due to strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
28. Rule 9.4.20 – this rule requires a Sub-Area Spatial Plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
29. Rule 9.5.18 – this rule requires that development “shall be undertaken in accordance with the Structure Plan”. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording is very strict does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some

flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.

30. Rule 8.5 – Standards – At a high level 'bulk and location' controls proposed are considered to enable the built form outcomes conducive to ensuring a wide range of housing types or more affordable housing options (Policy 8.2.12.1).
31. Rule 9.5.24.2 and 9.5.24.3 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45 litre bag is a PB75. A PB45 is 27 litres. This should be clarified.
32. Rule 9.5.36 – this rule is opposed as it could lead to unintended outcomes and delays.
33. 9.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the HDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

34. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
35. Rule 15.5.1.2d – matter of discretion 'd', relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
36. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

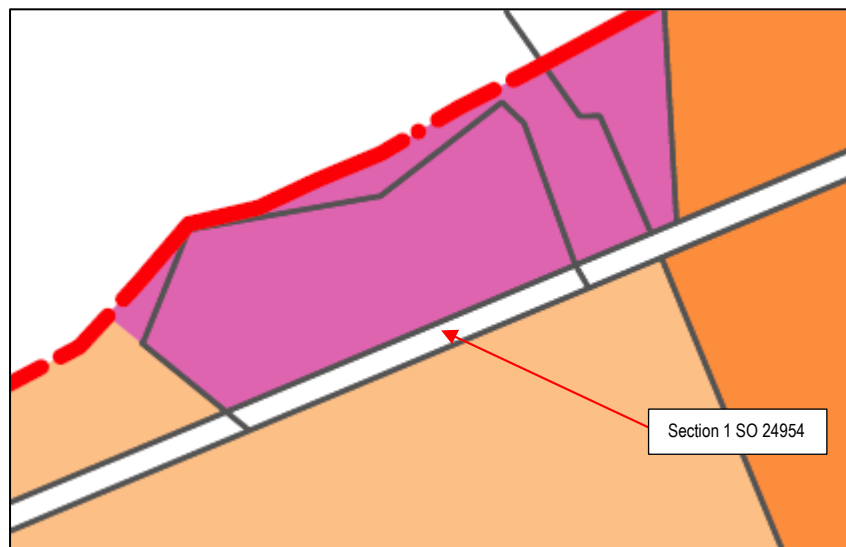
Dear Liz,

FEEDBACK OF MR MARK TYLDEN ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS

Mr Mark Tylden **supports** the proposed planning provisions and the approach of a Council-led plan variation. Mr Tylden has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and *Pinus radiata*. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

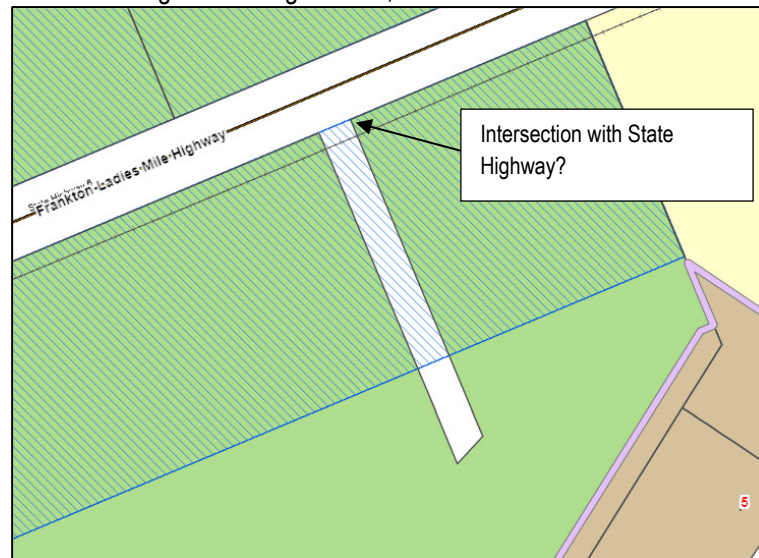
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 9 – High Density Residential

25. Objective 9.2.9 – this objective is opposed as reads like a policy – “*Development requires...*”. To read like an objective it could be altered to read “*Development achieves...*”
26. Policy 9.2.9.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
27. Policy 9.2.10.1 – this policy is opposed due to strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
28. Rule 9.4.20 – this rule requires a Sub-Area Spatial Plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
29. Rule 9.5.18 – this rule requires that development “shall be undertaken in accordance with the Structure Plan”. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording is very strict does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston

Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.

30. Rule 8.5 – Standards – At a high level ‘bulk and location’ controls proposed are considered to enable the built form outcomes conducive to ensuring a wide range of housing types or more affordable housing options (Policy 8.2.12.1).
31. Rule 9.5.24.2 and 9.5.24.3 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45 litre bag is a PB75. A PB45 is 27 litres. This should be clarified.
32. Rule 9.5.36 – this rule is opposed as it could lead to unintended outcomes and delays.
33. 9.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the HDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

34. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
35. Rule 15.5.1.2d – matter of discretion ‘d’, relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
36. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

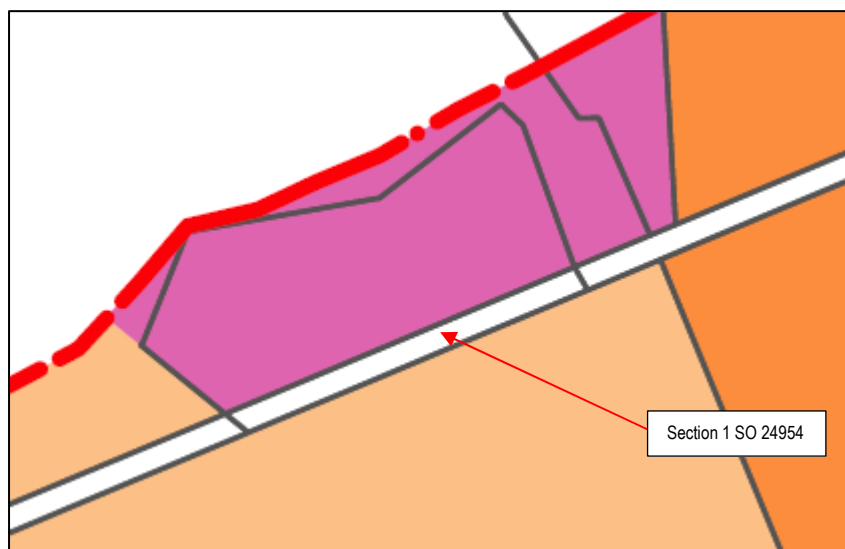
**FEEDBACK OF THE MILSTEAD TRUST
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The Milstead Trust are the owners of Lot 2 DP 463532, a 7.1-hectare property adjoining the Frankton-Ladies Mile Highway.

Overall, the Milstead Trust **support** the proposed planning provisions and the approach of a Council-led plan variation. The Milstead Trust has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and Pinus radiata. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

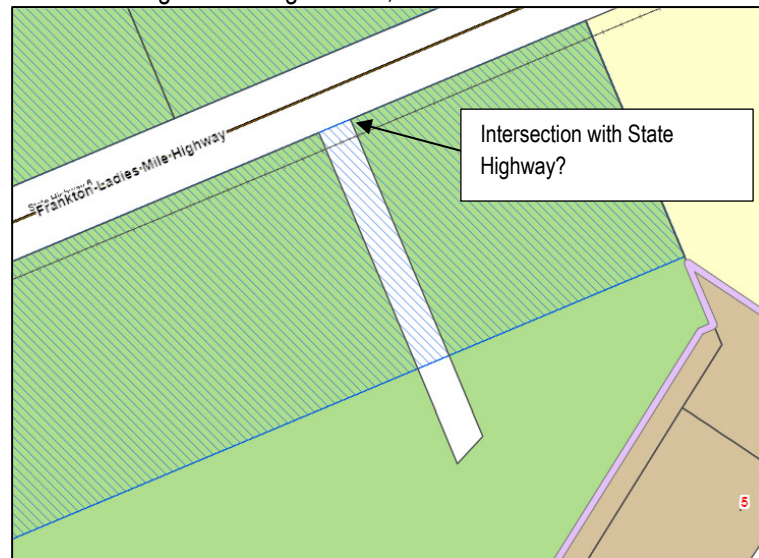
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

25. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
26. Rule 15.5.1.2d – matter of discretion ‘d’, relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
27. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

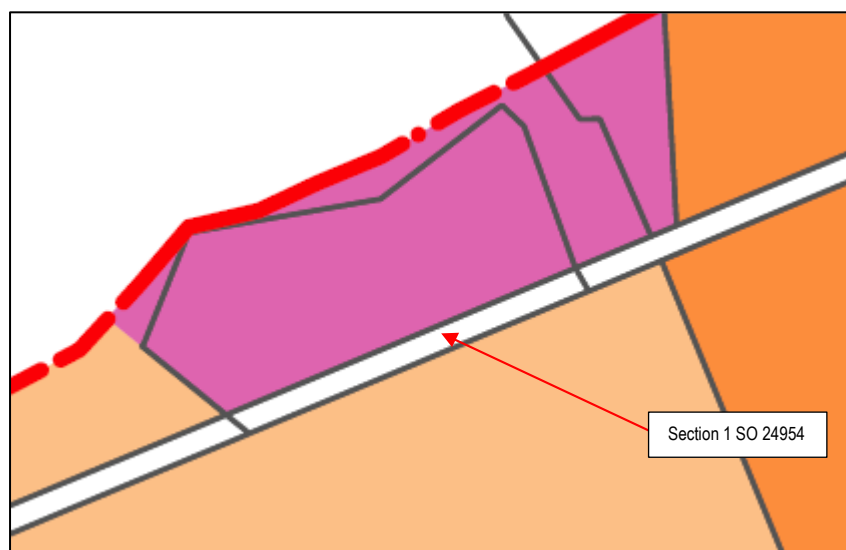
Dear Liz,

**FEEDBACK OF MR PAUL WISBEY
ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

Mr Paul Wisbey **supports** the proposed planning provisions and the approach of a Council-led plan variation. Mr Wisbey has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and Pinus radiata. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

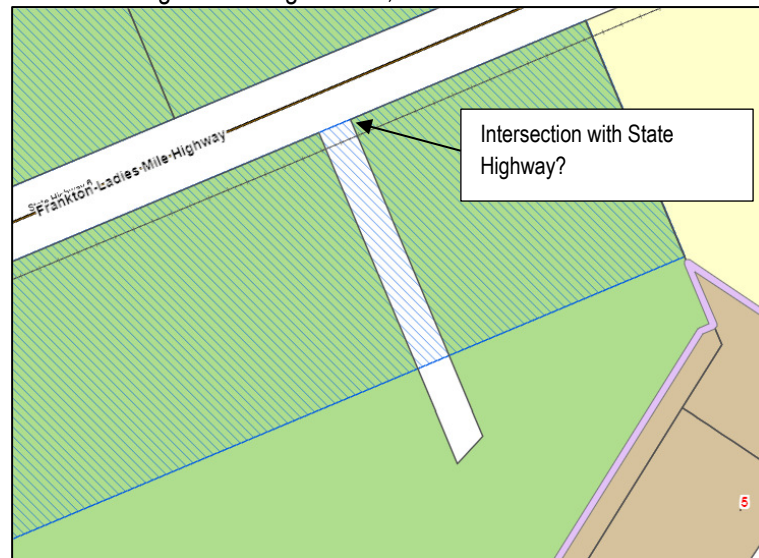
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 9 – High Density Residential

25. Objective 9.2.9 – this objective is opposed as reads like a policy – “*Development requires...*”. To read like an objective it could be altered to read “*Development achieves...*”
26. Policy 9.2.9.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
27. Policy 9.2.10.1 – this policy is opposed due to strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
28. Rule 9.4.20 – this rule requires a Sub-Area Spatial Plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
29. Rule 9.5.18 – this rule requires that development “shall be undertaken in accordance with the Structure Plan”. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording is very strict does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston

Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.

30. Rule 8.5 – Standards – At a high level ‘bulk and location’ controls proposed are considered to enable the built form outcomes conducive to ensuring a wide range of housing types or more affordable housing options (Policy 8.2.12.1).
31. Rule 9.5.24.2 and 9.5.24.3 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45 litre bag is a PB75. A PB45 is 27 litres. This should be clarified.
32. Rule 9.5.36 – this rule is opposed as it could lead to unintended outcomes and delays.
33. 9.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the HDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

34. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
35. Rule 15.5.1.2d – matter of discretion ‘d’, relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
36. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

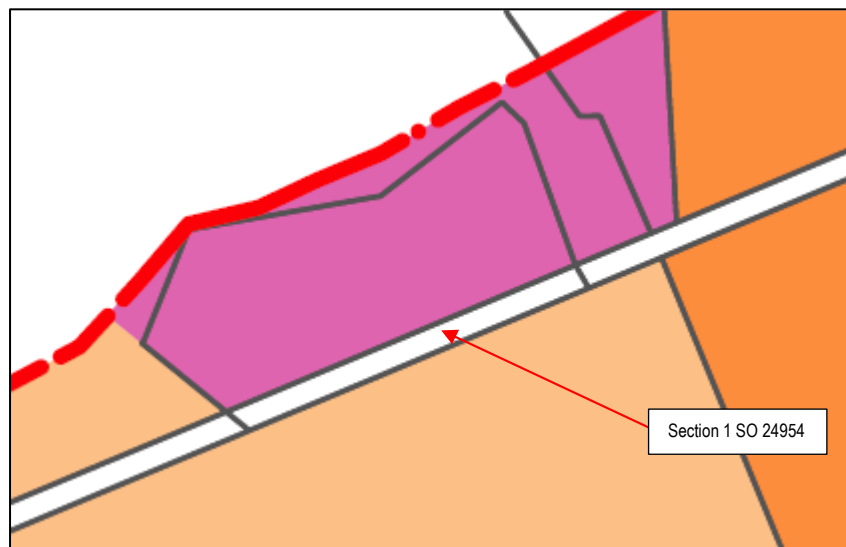
Dear Liz,

**FEEDBACK OF MS. TRACEY WAGER
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

Ms. Tracey Wager **supports** the proposed planning provisions and the approach of a Council-led plan variation. Ms. Wager has several points of constructive feedback on the draft provisions as set out below.

Feedback on Proposed Zone Map

1. A parcel of land in front of the Glenpanel Homestead is incorrectly shown as legal road on the proposed Zone map. This parcel of land is private property (legal description is Section 1 SO 24954). Having this parcel of private property incorrectly shown as legal road can cause problems when subdividing as the application of bulk and location controls to unzoned land is unclear, and it may end up tipping a future application into a non-complying activity status. The area of land should be shown zoned as Medium Density Residential. The parcel of land is shown in the image below marked with a red arrow.



2. All of the legal roads should be shown as *zoned*, as they are going to be re-arranged in accordance with the Structure Plan. Leaving them shown on the planning maps as unzoned legal road makes the final subdivision and development more difficult once the roads are re-aligned, as some of the land that is currently shown as legal road will be used for housing or other development. This will create unfortunate situations where people will need resource consent for a future development because it happens to be in the position of what is currently shown as legal road.

Feedback on Structure Plan - General

3. The 'Existing Trees to be Retained' annotation covers the whole of the Glenpanel Homestead block (Lot 1 DP 20162). This is inaccurate as the trees do not occupy the whole site, as shown in the aerial photography. Furthermore, many of the trees are exotic wilding species that should not be protected. These include Douglas fir and Pinus radiata. The extent of the 'Existing Trees to be Retained' annotation should be significantly reduced to match the extent of actual tree locations, and the planning provisions should recognise that not all of these trees are desirable for retention.

Feedback on Structure Plan - Building Height Plan

4. On the Building Heights plan – the red colour for the 24.5m max in the Legend does not match the colour applied to the plan.

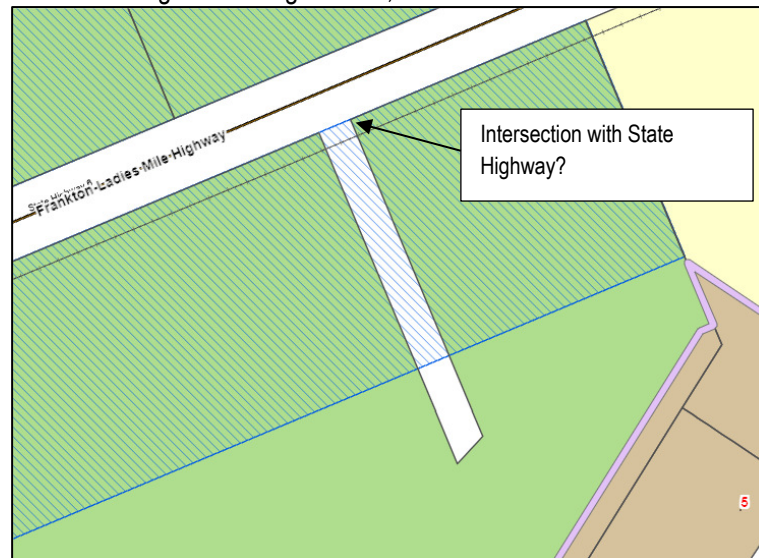
Feedback on Structure Plan – Sections

5. The Building Restriction Area is 25m according to the cross section for the State Highway (Sheet 1 of 3) but the Amenity Access Area is 20m. It is unclear why the 5m difference given that any built form near the boundary with the Amenity Access Area would be subject to a 3m road boundary setback requirement (for MDR), which is required to be landscaped under the zone provisions, and would have the same or similar landscaped effect as the additional 5m of Building Restriction Area. This 5m area should be reviewed to determine its necessity as it results on a loss of land for housing.
6. On the cross section for the State Highway (Sheet 1 of 3), there is also a 2.2m widening, rather than using the existing NZTA boundary. The 25m Building Restriction Area is taken from the widened State Highway, meaning landowners effectively lose 27.2m plus a 3m road boundary setback from that line for new buildings. Again, the loss of land for housing from these additional widenings in addition to setback provisions must be carefully weighed up.

Chapter 27 – Subdivision

7. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.
8. Policy 27.3.17.1 – this policy is initially strongly worded, to “require that subdivision and development is undertaken...” but only to “promote” certain outcomes. There appears to be a disconnect between the first and second parts of the policy, one part is strongly worded the other part is relatively weakly worded.
9. Policy 27.3.17.2 requires the whole Sub-Area be subdivided, OR for a part area, that a Sub-Area Spatial Plan be provided. It is noted that few Sub Areas are in single ownership meaning the norm will be that a Sub-Area Spatial Plan is provided. This policy is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. The Sub-Area Spatial Plan will not be effective as it will at best be a ‘best guess’ as to what might happen on adjoining land. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan policy and rules can be deleted.
10. Policy 27.3.17.4b – it is unclear what “*Door step play (i.e., play along the way)*” means.

11. Policy 27.3.17.5d –this policy states “Support visual links north to open spaces at the base of Slope Hill when viewed from intersections on State Highway 6”. This policy is opposed as it will have unintended consequences. For example, a portion of legal road extends into the property at 516 Frankton-Ladies Mile Highway as shown in the image below. This could be counted as an intersection on State Highway 6. The policy could be re-worded to make it clear it only relates to:
- Only those intersections shown on the structure plan (noting that other accesses off the State Highway have already been consented), and
 - Only visual links along the roading corridor, and not a wider area.



12. Policy 27.3.17.6a and c – these policies are opposed as noted above, a new access has been approved by Waka Kotahi New Zealand Transport Agency (NZTA) at the site legally described as Lot 2 DP 463532.
13. Rules 27.6 – the absence of minimum lot area for Medium and High Density zones within the Ladies Mile area is supported.
14. Rule 27.7.14.1 – oppose the wording of the matters of discretion, as some read more like Assessment Matters than matters of discretion. For example, 27.7.14.1b “the impact of the proposed subdivision on the future implementation of the Structure Plan” would be better placed with the Assessment Matters rather than a matter of discretion.
15. Assessment Matter 27.9.8.1d ii (e) – this assessment matter is opposed:

(e) ensuring that existing natural and cultural features are accessible to the public and, where appropriate, form prominent features within the overall design.

The concern is that:

- It reads like a policy rather than an assessment matter – “ensuring”.
- The Glenpanel Homestead is a historic feature, but ultimately it is private property. It is inappropriate for the assessment matter to try and ‘ensure’ that it is accessible to the public.

Chapter 8 – Medium Density Residential

16. Objective 8.2.12 – this objective is opposed as reads like a policy – “Development requires...”. To read like an objective it could be altered to read “Development achieves....”

17. Policy 8.2.12.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
18. Policy 8.2.13.2 – this policy is opposed due to the strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
19. Rule 8.4.27 – this rule requires a Sub-Area Spatial plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
20. Rule 8.5.20 – this rule requires development to be undertaken in accordance with the Structure Plan. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording “Development shall be in accordance with the Structure Plan...” is very strict and does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.
21. Rule 8.5 – Standards – A number of comments are made in relation to the package of ‘bulk and location’ controls proposed in the bullet points below. At a high level, the proposed standards are forcing built form outcomes that are not necessarily conducive to ensuring a wide range of housing types or affordable housing options (Policy 8.2.12.1).

It is well understood that (at least at the walk-up scale) that buildings cost more to construct as they go up in height. The cheapest form of construction is single-level, free-standing, light-weight framed buildings. Getting closer than 2m separation between building requires additional fire and acoustic attenuation and the cost increases. Likewise multilevel dwellings are more expensive to produce. Multi-level, multiunit development is almost double the cost to produce due to fire and acoustic requirements for intertenancy walls and floors. They also require more capital and are exposed to higher risk as revenue cannot be generated until an entire complex achieves title. Attached units (whether duplex or terraced forms) whilst more expensive to construct, generally occupy less land which gives an off-set saving. However, for this saving to translate to the end user the land value needs to be substantially more than the cost of construction.

It is for this reason that intensive build form outcomes only work (both from a developer and designer perspective) in areas which have high amenity and command the highest land values. This of course means that they can actually be an ‘unaffordable’ housing model. Notwithstanding, it is completely possible to deliver small compact houses (with off-street parking) using light-weight construction methodology on sites around 150m². Even on such small sites, 3+ bedroom homes can be delivered at 2 levels.

However, the package of rules makes it very difficult to build detached medium density residential housing, even though detached residential units can still deliver the density outcome sought by the plan change. Bridesdale is an example of detached medium density housing that can meet the Ladies Mile

density outcomes. Freestanding compact dwellings can be achieved on sites less than 250m² quite easily with good design and should be part of the palette of responses.

Other comments in relation to the proposed controls are listed below:

- The site coverage (45%) and height (13m) controls proposed are supported;
 - Side yard requirements should be reduced from 1.5m to 1m;
 - Outlook space requirement from the principle living room should be reduced from 10x4m to 6x4m
 - Recession planes;
 - Permit 2 levels as of right with a 6m+45° recession plane (within the first 20m) from a street (to push built form towards the street); and
 - Are more restrictive from the rear boundary (2.5m+35°) to enable usable rear yard space.
22. Rule 8.5.24 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45-litre bag is a PB75. This should be clarified.
23. Rule 8.5.41 – this rule is opposed as it could lead to unintended outcomes and delays.
24. 8.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the MDR zoned land.

Chapter 9 – High Density Residential

25. Objective 9.2.9 – this objective is opposed as reads like a policy – “*Development requires...*”. To read like an objective it could be altered to read “*Development achieves...*”
26. Policy 9.2.9.2 – this policy is opposed as it could threaten the plan change objectives for the Ladies Mile. The policy seems inconsistent with the staged approach to infrastructure required elsewhere in the plan change provisions.
27. Policy 9.2.10.1 – this policy is opposed due to strong use of the word “require” for development to be in accordance with the Structure Plan. This does not align with the Subdivision chapter which uses the term “consistency”. For example, Assessment Matter 27.9.8.1b refers to “consistency with the structure plan” and Rule 27.7.14.2 places subdivision that is “inconsistent” with the structure plan into the non-complying consent category.
28. Rule 9.4.20 – this rule requires a Sub-Area Spatial Plan to be provided for two or more residential units per site (where a Sub-Area Spatial Plan has not been provided as part of a subdivision). This rule is opposed for similar reasons noted above relating to Subdivision Rule 27.3.17.2. This rule is opposed as there are a large number of different landowners on the Ladies Mile all with differing development ambitions and timeframes. Some landowners have been ready to develop for years while others are opposed. While the intention to ensure integrated management is commendable, the Sub-Area Spatial Plan will not be effective or efficient and the Structure Plan provides sufficient guidance. The Sub-Area Spatial Plan will not be effective as it will at most be a ‘best guess’ as to what might happen on adjoining land. The Information Requirements to provide a Sub-Area Spatial Plan rule can be deleted.
29. Rule 9.5.18 – this rule requires that development “shall be undertaken in accordance with the Structure Plan”. The present wording is opposed as it will potentially put numerous consents into the non-complying activity status. The wording is very strict does not allow for road movement as per subdivision Rule 27.7.14.2. For example, if a road is in a different location by say 5m, the development would likely be classed as a non-complying activity. The term “general accordance” is preferred as it enables some flexibility, and this wording is used with regard to other zones with Structure Plans, such as the Kingston

Village Special Zone, to recognise that changes inevitably arise between the zoning and consenting stage.

30. Rule 8.5 – Standards – At a high level ‘bulk and location’ controls proposed are considered to enable the built form outcomes conducive to ensuring a wide range of housing types or more affordable housing options (Policy 8.2.12.1).
31. Rule 9.5.24.2 and 9.5.24.3 – the reference to PB45L is an error, as PB stands for pint bag (600ml), which is a different volume measurement to a Litre (1000ml). A 45 litre bag is a PB75. A PB45 is 27 litres. This should be clarified.
32. Rule 9.5.36 – this rule is opposed as it could lead to unintended outcomes and delays.
33. 9.7 – Assessment matters – a(ii) – refers to heritage items. There are no heritage items or trees within the HDR zoned land.

Chapter 15 – Local Shopping Centre Zone (LSCZ)

34. Rule 15.4.3.3a – this matter of discretion is to “historic heritage and the amenity values of Glenpanel Homestead and its setting, including landscaping and ancillary buildings”. This matter of discretion is opposed as it is too subjective. It is recommended that it be removed and a new zone rule be specified relating to a 15m setback from the Homestead.
35. Rule 15.5.1.2d – matter of discretion ‘d’, relates to effects on landscape values on the Slope Hill ONL. This matter of restricted discretion should be deleted, as the zoning clearly enables a distinctly urban Local Shopping Centre Zone, and incorporating reference to try and protect the ONL at the same time with confuse matters and result in perverse outcomes such as landscape assessment reports being required. Furthermore, the ONL line is higher up Slope Hill, such that it will not be affected by the height of development enabled within the LSCZ.
36. Rule 15.5.7a –this rule is opposed. The building height rule of 7m is lower than the height of the existing Glenpanel Homestead. It is understood that this was deliberately written this way to ensure new buildings do not dominate the Homestead, however a more effective approach would be specifying a setback from the Glenpanel Homestead of 15m as noted above.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER



Sanderson
G R O U P

*The family name in luxury
retirement living*

Wednesday 26 May 2021

To Queenstown District Lakes Council (QDLC),

RE: Te Pūtahi Ladies Mile Draft Masterplan Survey

Thank you for the opportunity to provide comment on the proposed draft masterplan for Te Putahi Ladies Mile. We would like to thank QDLC for the recent public consultation which we enjoyed and came away feeling that it was a constructive evening.

Queenstown Commercial Limited and Sanderson Group have significant interests in Ladies Mile as the 489 Frankton-Ladies Mile landowner, developers of the Kawarau Park medical / retail precinct and Kawarau Heights the residential subdivision, and the former owners of the Queenstown Country Club.

We have made large investments and enhanced the area setting a high standard through developing these projects while preserving the natural landscape and protecting the Ladies Mile gateway into Queenstown.

Generally we feel the proposed layout of the draft masterplan is good and would encourage QDLC to consider the following matters in finalising the master plan:

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan.

It is our intention that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Sanderson Group is interested in the proposal (masterplan and draft planning provisions) in its entirety. Without limiting the above, the specific provisions that this submission relates to are:

- a) Chapter 27 – subdivision and development;
- b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
- c) Chapter 8 Medium Density Residential;
- d) Chapter 9 – High density Residential;
- e) Chapter 15 – Local Shopping Centre Zone;
- f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
- g) Chapter 29 – Transport;

Preserving the Ladies Mile gateway

In working through the planning approval for the Queenstown Country Club we advocated for a 75 metre setback either side of Frankton-Ladies Mile to preserve the gateway and natural landscape. This decision has been proven in practice through the subsequent development of the Queenstown Country Club. While we would prefer the 75 metre setback was maintained along the complete length of Frankton-Ladies Mile we would be satisfied with a 50 metre minimum offset.

Developing a self-sufficient satellite community

Reducing traffic impacts and eliminating the need to travel over the constrained Shotover River Bridge should be a key objective of the master plan given the current population of Lake Hayes and Shotover already exceeds Arrowtown and that the potential future population of 15,000 is significant in the overall context of the Queenstown Lakes region.

The masterplan has allowed for schooling and recreational facilities but further consideration should be made so it is developed as a self-sufficient satellite community where it can provide for itself and contains all the required services and lifestyle options needed without the need for travel.

An example in the North Island where planning has failed to address this situation is the daily gridlocked on the 10 km stretch of State Highway 2 crossing the Wairoa River between Omokoroa and Bethlehem where there are no alternatives but to travel this route for work and access to essential services.

To help mitigate this traffic issue the Western Bay of Plenty Council are implementing a plan change to accommodate an increased population of 2,000 for a total of 12,000 to 15,000 people at Omokoroa by providing a designated school area (bought by the Ministry of Education), additional zoning of high density residential land, and the approval of a large town centre on an 8 ha site within this area. This will significantly reduce traffic movements required to access State Highway 2 into Tauranga city.

The development of Ladies Mile must follow a similar approach and ensure that adequate space is provided not only for schooling and high density residential, but also for the town centre being the hub of the community. This hub needs to accommodate facilities that provide working, living and lifestyle options for the local community within this area.

Village Centre Extent

The village centre needs to be appropriately sized and shaped to accommodate everything that is needed in a self-sufficient community and be a place that brings the community together.

We believe the ideal town centre would incorporate a central courtyard for community use surrounded by commercial and retail e.g. café and food outlets facing the north with supermarket on the opposite side. The courtyard would have outdoor dining area containing a playground etc. Other facilities would surround this area including commercial, essential retail and other services. This can be developed as low rise that is surrounded by higher density living.

We have provided Attachment 1 containing illustrative images of what a village community may look like developed around a central courtyard. A potential layout of this is also provided.

Streamlined Planning Process

It is critical for both property owners and developers to be provided with future certainty. We believe that a streamlined application process for the required variation to the District Plan will help increase confidence in the intended outcome and associated timeline.

General

Within Chapters 15 and 19B in particular, the intention of creating a diversified mix of urban uses is supported, however provisions which require strict adherence to a structure plan layout should be reconsidered, as over-prescription at this stage of the planning framework can have the potential to limit quality urban design and responsive planning.

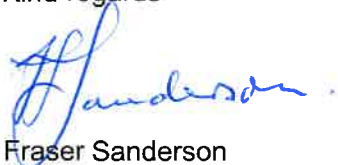
Within Chapters 27, 15, 19B, 29 and each of the notified residential chapters, there are requirements to upgrade infrastructure prior to development proceeding. While the intention of ensuring supporting infrastructure development in a timely fashion is supported, these provisions should also anticipate a greater degree of flexibility such as to ensure equitable, planning, and landowner-led outcomes. These provisions do not currently take into account future possibilities such as Government funding opportunities or changes in land use that could eventuate and effect timing and nature of infrastructure upgrades.

Although specific recommendations have been suggested to these planning provisions as set out in this submission, we are interested in, and submit on, the entirety of the proposal.

Sanderson Group seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.

We are welcome to discuss this feedback further in person and would encourage QLDC to consider this in finalising the master plan.

Kind regards



Fraser Sanderson

Chairman

Sanderson Group / Queenstown Commercial Limited

Attachment 1: Village Community Concepts and Potential Layout

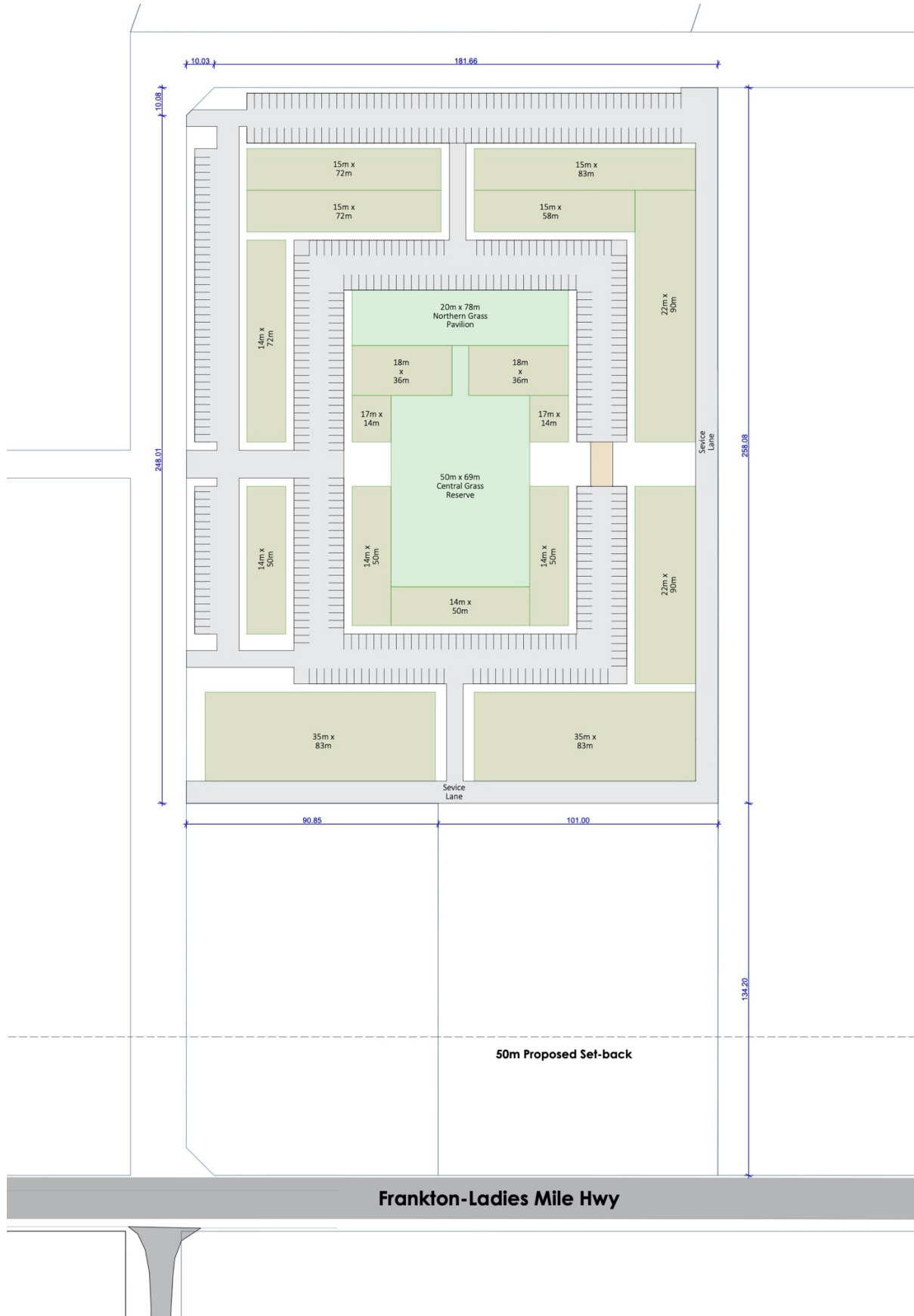
Image 1: Concept image providing illustration of an outdoor area next to a central courtyard within a potential village centre.



Image 2: Concept image showing architectural and landscaping of a potential village centre.



Image 3: Concept site plan for the potential village centre showing the central courtyard with various retail and commercial surrounding this.



28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

**FEEDBACK OF MR TOM KELLY
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The Kelly family own the property located on the corner of Stalker Road and State Highway 6. The site measures 3.3 hectares and is legally described as Lot 4 DP 325561.

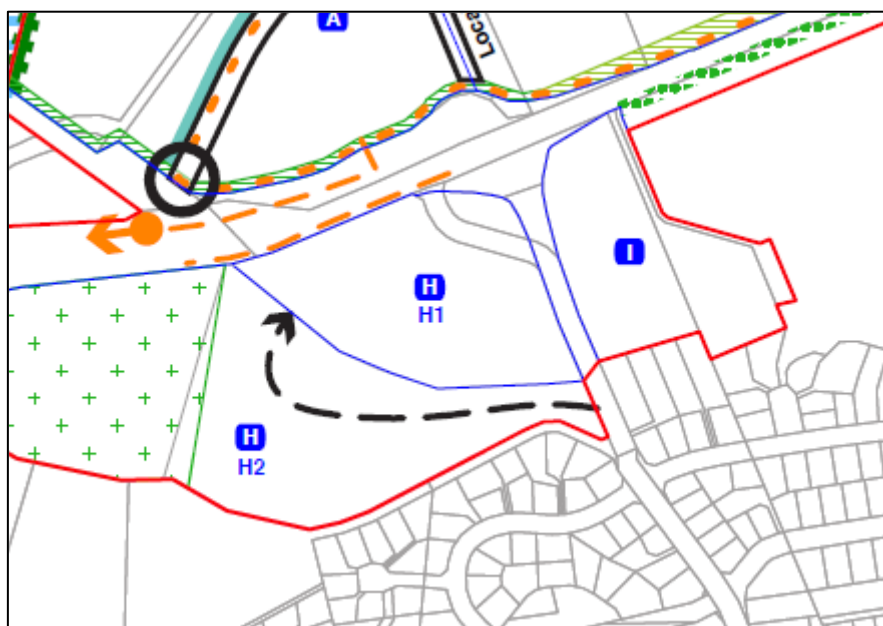
Mr Tom Kelly **supports** the proposed planning provisions, and the approach of a Council-led plan variation. Mr Kelly has several points of constructive feedback on the draft provisions as set out below.

Feedback on Zoning Map

1. The proposed Low Density Suburban residential zoning is supported.
2. The reduced Building Restriction Area is supported.

Feedback on Structure Plan - General

3. The proposed Structure Plan – General, shows a Vehicle Access Provision terminating at the boundary of the Kelly property, as shown in the image below.



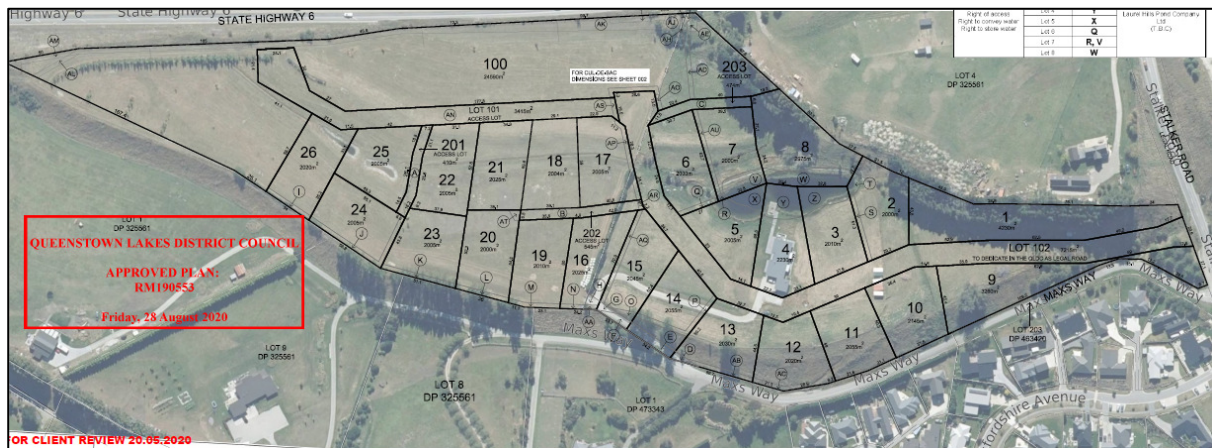
→ Vehicle Access Provision

This annotation is concerning as it terminates at the base of a steep embankment, as shown in the image below.



While it might be possible to achieve required gradients with extensive cut and fill, it is submitted that this link is shown incorrectly and attempting to create a link in this location is not feasible. Alternative locations would better provide for a link. It is requested that the link be removed.

The consenting of a Large Lot Residential subdivision (RM190553) shown below may also prevent the practical implementation of a link in the location shown on the Structure Plan.



Chapter 27 – Subdivision

4. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.

5. Policy 27.3.17.4b – it is unclear what “Door step play (i.e., play along the way)” means.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
 Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

**FEEDBACK OF MR RUSSELL KELLY
 ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The Kelly family own the property located on the corner of Stalker Road and State Highway 6. The site measures 3.3 hectares and is legally described as Lot 4 DP 325561.

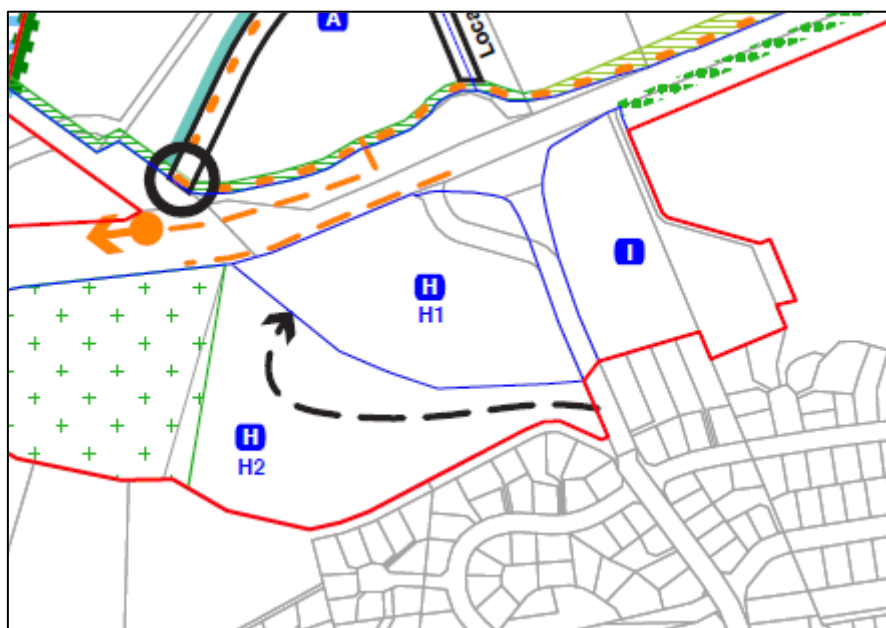
Mr Russell Kelly **supports** the proposed planning provisions, and the approach of a Council-led plan variation. Mr Kelly has several points of constructive feedback on the draft provisions as set out below.

Feedback on Zoning Map

1. The proposed Low Density Suburban residential zoning is supported.
2. The reduced Building Restriction Area is supported.

Feedback on Structure Plan - General

3. The proposed Structure Plan – General, shows a Vehicle Access Provision terminating at the boundary of the Kelly property, as shown in the image below.



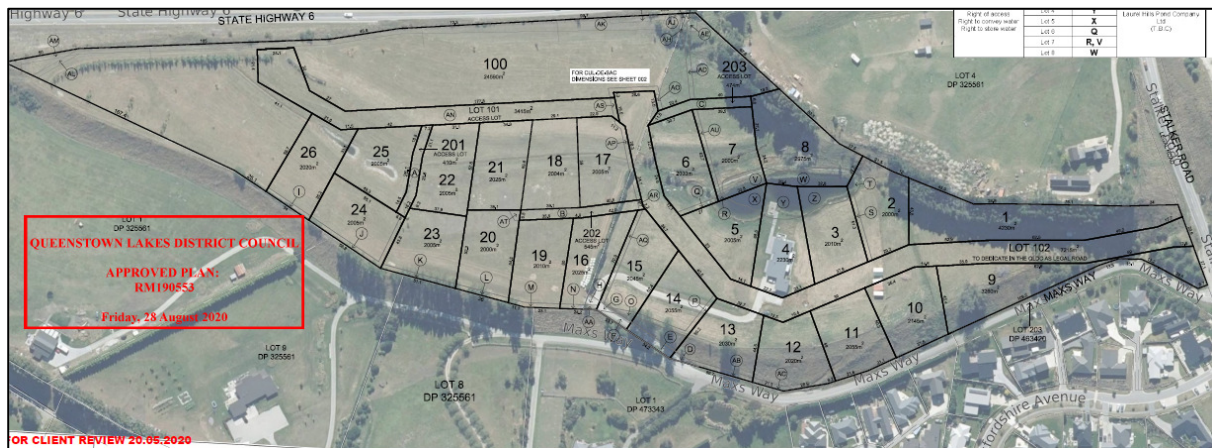
→ Vehicle Access Provision

This annotation is concerning as it terminates at the base of a steep embankment, as shown in the image below.



While it might be possible to achieve required gradients with extensive cut and fill, it is submitted that this link is shown incorrectly and attempting to create a link in this location is not feasible. Alternative locations would better provide for a link. It is requested that the link be removed.

The consenting of a Large Lot Residential subdivision (RM190553) shown below may also prevent the practical implementation of a link in the location shown on the Structure Plan.



Chapter 27 – Subdivision

4. Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.

5. Policy 27.3.17.4b – it is unclear what “Door step play (i.e., play along the way)” means.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

28 May 2021

Queenstown Lakes District Council
Private Bag 50072
QUEENSTOWN 9348

Attention: Ms. Liz Simpson

Dear Liz,

**FEEDBACK OF MS. JAN KELLY
ON THE DRAFT LADIES MILE TE PUTAHI PLANNING PROVISIONS**

The Kelly family own the property located on the corner of Stalker Road and State Highway 6. The site measures 3.3 hectares and is legally described as Lot 4 DP 325561.

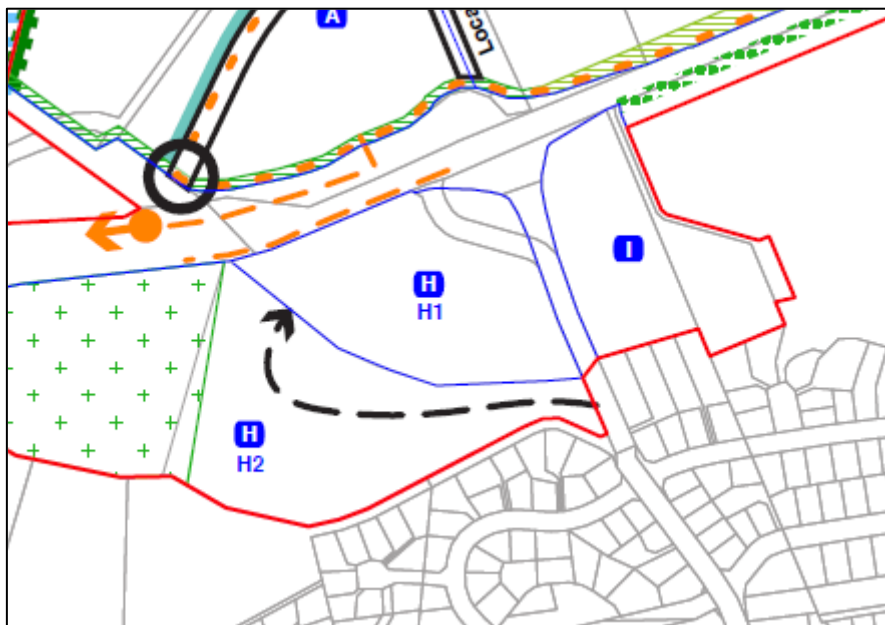
Ms. Jan Kelly **supports** the proposed planning provisions, and the approach of a Council-led plan variation. Ms Kelly has several points of constructive feedback on the draft provisions as set out below.

Feedback on Zoning Map

1. The proposed Low Density Suburban residential zoning is supported.
2. The reduced Building Restriction Area is supported.

Feedback on Structure Plan - General

3. The proposed Structure Plan – General, shows a Vehicle Access Provision terminating at the boundary of the Kelly property, as shown in the image below.



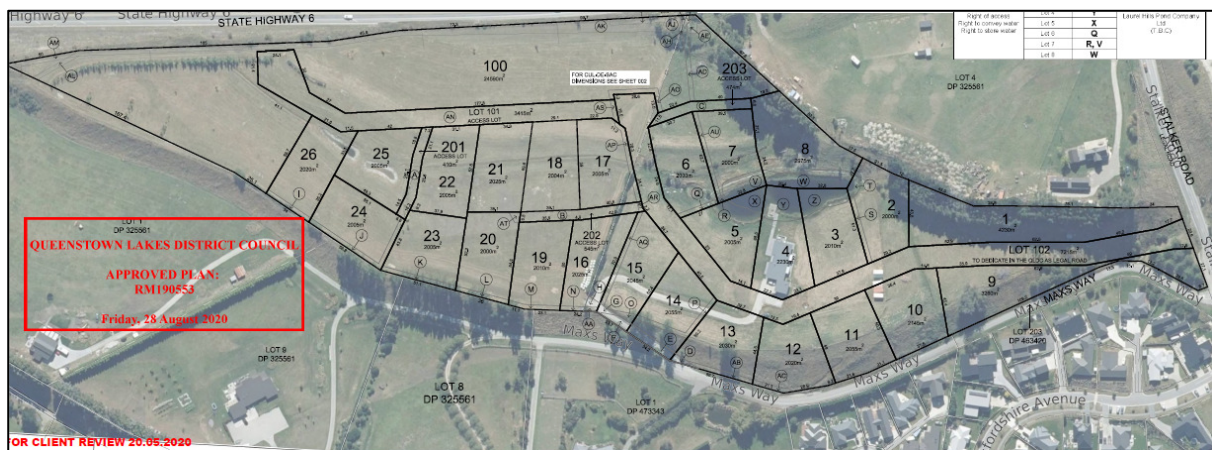
—➔ Vehicle Access Provision

This annotation is concerning as it terminates at the base of a steep embankment, as shown in the image below.



While it might be possible to achieve required gradients with extensive cut and fill, it is submitted that this link is shown incorrectly and attempting to create a link in this location is not feasible. Alternative locations would better provide for a link. It is requested that the link be removed.

The consenting of a Large Lot Residential subdivision (RM190553) shown below may also prevent the practical implementation of a link in the location shown on the Structure Plan.



Chapter 27 – Subdivision

- Objective 27.2.17 refers to how urban development “*complements and integrates with existing urban development and the surrounding landscapes*”. This objective is poorly drafted and it is unclear how buildings enabled in accordance with the height plan (e.g., up to 24.5m in HDR) can complement and integrate with the surrounding landscape. It is respectfully submitted that the overall objective of the plan change is to enable *urban* development, and the reference to complementing and integrating with the surrounding landscapes is a matter for consideration in non-urban zones. This objective will result in perverse outcomes such as landscape assessments being required for urban development, or the height plan being thwarted.

5. Policy 27.3.17.4b – it is unclear what “Door step play (i.e., play along the way)” means.

We trust the above is of assistance. Please contact me if you have any questions.

Yours faithfully



Blair Devlin
SENIOR RESOURCE MANAGEMENT PLANNER

To: Queenstown Lakes District Council
Private Bag 50072
Queenstown 9348

Submission on: Queenstown Lakes Draft Planning Provisions – Te Pūtahi Ladies Mile

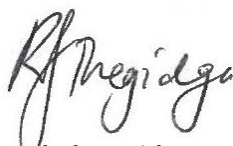
Name: **Queenstown Airport Corporation (QAC)**

1. This is a submission on Te Pūtahi Ladies Mile – Draft Planning Provisions
2. The specific provisions of the Draft Planning Provisions that QAC’s submission relates to are:
 - Proposed Standard 8.5.30 – Glare
 - Proposed Standard 9.5.28 – Glare
 - Proposed Policy 19B.2.3.6
 - Proposed Standard 19B.5.10 – Glare
3. **QAC’s submission is:**
 - 3.1 Queenstown Airport is owned and operated by QAC, which is a network utility operator and requiring authority under the Resource Management Act 1991 (“the Act” or “the RMA”). Queenstown Airport is also a lifeline utility under the Civil Defence Emergency Management Act 2002 and is considered an ‘Airport Authority’ under the Airport Authorities Act 1966 (AAA). It is required under the AAA to operate and manage its airport as commercial undertakings, including carrying out improvements where necessary.
 - 3.2 QAC is a Council-Controlled Trading Organisation for the purposes of the Local Government Act 2002. The company is owned by one majority and one minority shareholder:
 - 75.01% by the Queenstown Lakes District Council
 - 24.99% by Auckland International Airport Limited.
 - 3.3 QAC’s purpose is to create long-term value and benefits for its shareholders, business partners and the communities of the Queenstown Lakes District, assessed against the four ‘wellbeing’ measures under the Local Government Act: social, environmental, economic and cultural.
 - 3.4 QAC’s primary activity is the safe and efficient operation of Queenstown Airport, facilitating air connectivity through the provision of infrastructure in the region, to meet the needs of our customers, the residents of, and visitors to the lower South Island. This includes the provision of appropriate and sound aeronautical and associated infrastructure and facilities for the unique operations at the airport.
 - 3.5 As the safe and efficient operation of the airport is QAC’s primary activity, with this comes an obligation to actively monitor proposed and existing land use activities within the area to ensure that the operational requirements of the airport remain suitably protected and provided for.

Lighting and Glare

- 3.6** Inappropriately managed lighting in close proximity to Queenstown Airport has the potential to give rise to adverse lighting and glare effects, particularly for pilots on approach or departure from Queenstown Airport. This includes lighting that may mimic airfield lighting.
- 3.7** QAC supports the inclusion of lighting and glare standards that seek to manage these effects. This includes standards that encourage the downward focus of lighting in surrounding zones. Where lighting and glare standards are breached, QAC submits that a new matter of discretion is required to ensure the effects of the breach on aircraft operations can be considered. This is necessary as the existing reference to “the transportation network” does not, by definition, capture aircraft operations.
- 3.8** QAC’s submission points are addressed in further detail in **Annexure A**, which is attached to and forms part of this submission.
- 4. QAC seeks the following decision from the local authority:**
- 4.1** The submission points contained in Section 3 above and in **Annexure A** which is attached to and forms part of this submission be accepted, or that the Draft Planning Provisions be amended in a similar or such other way as may be appropriate to address QAC’s submission points; and
- 4.2** Any consequential changes, amendments or decisions that may be required to give effect to the matters raised in QAC’s submission.
- 5. QAC wishes to be heard in support of its submission.**

Signature:



Rachel Tregidga

General Manager, Property and Planning
Queenstown Airport Corporation

Date:

28 May 2021

Contact Details

Postal Address for Service: [REDACTED]
[REDACTED]
[REDACTED]

Electronic Address for Service: [REDACTED]

Contact Person: Melissa Brook

Telephone: [REDACTED]

Email: [REDACTED]

ANNEXURE A

QUEENSTOWN AIRPORT CORPORATION'S SUBMISSION POINTS

Provision	Position	Reason	Relief Sought
Rule 8.5.30 Glare	Oppose	Refer to paragraphs 3.6 and 3.7 of QAC's covering submission.	Amend the matters of discretion as follows: <i>a. <u>Effects of light and glare on amenity values, the transportation network, aircraft operations and the night sky</u></i>
Rule 9.5.28 Glare	Oppose	Refer to paragraphs 3.6 and 3.7 of QAC's covering submission.	Amend the matters of discretion as follows: <i>a. <u>Effects of light and glare on amenity values, the transportation network, aircraft operations and the night sky</u></i>
Policy 19B.2.3.6 Ensure that the location and direction of lights does not cause significant glare to other properties, roads, and public places and promote lighting design that mitigates adverse effects on views of the night sky.	Oppose	Refer to paragraphs 3.6 and 3.7 of QAC's covering submission.	Amend Policy 19B.2.3.6 as follows: <i><u>Ensure that the location and direction of lights does not cause significant glare to other properties, roads, flight paths, and public places and promote lighting design that mitigates adverse effects on views of the night sky.</u></i>

<p>Rule 19B.5.10 Glare</p>	<p>Oppose</p>	<p>Refer to paragraphs 3.6 and 3.7 of QAC's covering submission.</p>	<p>Amend Rule 19B.5.10 as follows:</p> <p><u>19B.5.10.1 All exterior lighting, other than footpath or pedestrian link amenity lighting, installed on sites or buildings within the zone shall be directed away from adjacent sites, roads, flight paths and public places and directed downwards so as to limit the effects on views of the night sky.</u></p> <p><u>19B.5.10.2</u></p> <p><u>19B.5.10.3</u></p> <p><u>19B.5.10.4 Lighting shall not mimic a design or form that resembles or conflicts with aircraft operations at Queenstown Airport.</u></p> <p>Amend the matter of discretion as follows:</p> <p><u>d. Effects of lighting and glare on aircraft operations.</u></p>
-----------------------------------	---------------	--	---

Submission o T Pūtahi Ladies Mile Masterplan

To: Queenstown Lakes District Council (QLDC)
letstalk@qldc.govt.nz

Submitter: G W Stalker Family Trust
[REDACTED]

This submission is made on behalf of the GW Stalker Family Trust (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (**RMA**)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, generally known as 'Slope Hill'.

Parts of the masterplan and planning provisions that this submission relates to:

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
 - (a) Chapter 27 – subdivision and development;
 - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
 - (c) Chapter 8 Medium Density Residential;
 - (d) Chapter 9 – High density Residential;
 - (e) Chapter 15 – Local Shopping Centre Zone;
 - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre; and
 - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

Reasons for submission:**Process:**

- 4 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 5 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 6 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 7 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 8 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

Zoning map, ONL, and structure plan area:

- 9 The northern boundary of the structure plan outline is sought to be amended to follow a refined ONL identification, based upon a finer grained assessment of the topography and values of this landscape unit. The extent of the proposed Structure Plan / Zoning Map should follow this refined boundary. This ONL is yet to be tested through the District Plan Review process and is not based upon a detailed landscape assessment. Within this location there is potentially further suitable land for further residential and lifestyle development, which is consistent with the intentions of the Te Pūtahi Ladies Mile Masterplan process. The Submitter seeks the ONL be amended and that developable land outside of the amended ONL be rezoned for either rural living (residential or precinct), or LDR, LLR, or included in the Masterplan if the process is to continue to RMA notification. The Submitter also seeks that the UGB be amended to align with the amended ONL.
- 10 The Submitters are concerned with lack of integration with adjacent rural and rural living development / land uses. There is a significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill, as well as existing lifestyle developments.
- 11 The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 12 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood, Slope Hill and Springbank Grove / Lower Shotover Road) given those land uses may be incompatible with, and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters.

Decision sought:

- 13 The Submitter seeks the following decisions from the QLDC:

- (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
- (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
- (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
 - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;
 - (ii) Greater recognition of amenity effects on, and protection of, adjacent rural, and lifestyle uses and developments, including in the form of increased setbacks, lower densities of development within the Masterplan, and more sensitive urban / rural mitigation and edge treatments;
 - (iii) Amendment of the ONL boundary at the base of Slope Hill such that developable land is included in the Masterplan and rezoned.
 - (iv) Amendment of the UGB to align with the amended ONL.

14 The Submitter wishes to be heard in support of this submission.

15 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

28 May 2021



GW Stalker Family Trust
Signed by their duly authorised agents
Anderson Lloyd
Per: Maree Baker-Galloway
Address for service: [REDACTED]

Submission on Te Pūtahi Ladies Mile Masterplan

To: Queenstown Lakes District Council (QLDC)
letstalk@qldc.govt.nz

Submitter: Grant and Sha yn Stalk r
[REDACTED]

This submission is made on behalf of Grant and Sha yn S alker (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The submitter could not gain an advantage in trade competition through his submission (clause 6(4) Schedule 1 Resource Management Act 1991 (RMA)).

This submission has been prepared in accordance with the requirement of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Resource Management Act. It is the intention of the Submitter that this submission be accepted as a contribution to this consultation process, as well as any future formal RMA notification process under Section 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within and adjacent to, the Pūtahi Ladies Mile Masterplan area, outlined in red in the zoning map attached as **Appendix A**.

Parts of the Masterplan and planning provisions that this submission relates to:

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 In outlining the generality of the above, the specific provisions that this submission relates to are:
 - a) Chapter 27 – subdivision and development;
 - b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
 - c) Chapter 8 Medium Density Residential;
 - d) Chapter 9 – High density Residential;
 - e) Chapter 15 – Local Shopping Centre Zone;
 - f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
 - g) Chapter 29 – Transport
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

Reasons for submission:

- 4 Specific recommendations to the notified charter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

Process:

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.

Zoning map and structure plan area:

- 9 The Submitters are concerned with lack of integration with adjacent rural and rural living development / land uses. There is a significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill, as well as existing lifestyle developments.
- 10 The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 11 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood, Slope Hill and Springbank Grove / Lower Shotover Road) given those land uses may be incompatible with, and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters.

Decision sought:

- 12 The Submitter seeks the following decisions from the QLDC:
 - (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
 - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
 - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
 - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;

- (ii) Greater recognition of amenity effects on, and protection of, adjacent rural and lifestyle developments (in particular on Springbank / Lower Shotover Road), including in the form of increased setbacks, lower densities of development within the Masterplan, and more sensitive urban / rural mitigation and edge treatments.

13 The Submitter wishes to be heard in support of this submission.

14 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

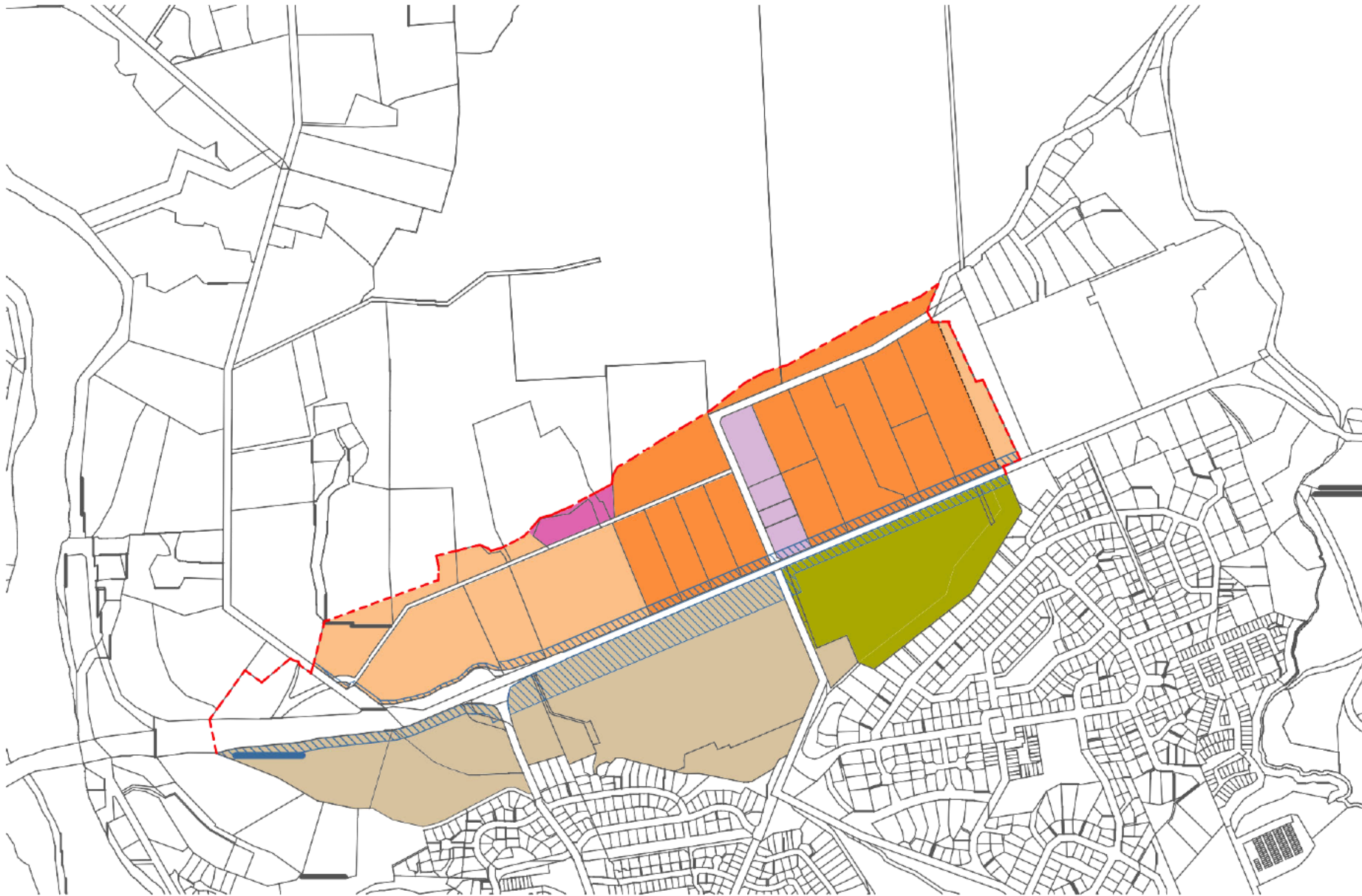
28 May 2021



Grant and Sharyn Stalker
Signed by their duly authorised agents
Anderson Lloyd
Per: Maree Baker-Galloway
Address for service: [REDACTED]

Te Pūtahi Ladies Mile Zoning Plan

1:10,000 @ A3
1:5,000 @ A1
100m 200m



- Key**
- Urban Growth Boundary Extension
 - Building Restriction
 - Town Centre
 - Local Centre
 - High Density Residential
 - Medium Density Residential
 - Lower Density Residential
 - Open Space - Community Purposes

**Submission of Te Pūahi Ladies Mile Masterplan
draft masterplan and planning provisions consultation**

To: Queenstown Lakes District Council
letstalk@qldc.govt.nz

Submitter: Shotover Country No. 2 Limited
[REDACTED]

This submission is made on behalf of Shotover Country No.2 Limited (**Submitter**) in respect of the Te Pūahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (RMA)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūahi Ladies Mile Masterplan area, outlined in red on the zoning map attached as **Appendix A**.

Parts of the masterplan and planning provisions that this submission relates to:

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
 - (a) Chapter 27 – subdivision and development;
 - (b) Te Pūahi Ladies Mile Masterplan, building heights plan, and zoning maps;
 - (c) Chapter 8 Medium Density Residential;
 - (d) Chapter 9 – High density Residential;
 - (e) Chapter 15 – Local Shopping Centre Zone;
 - (f) Chapter 19B Te Pūahi Ladies Mile Town Centre;
 - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

Reasons for submission:

- 4 Specific recommendations to the notified chapter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

Process

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 9 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

Zoning map and structure plan area:

- 10 The Zoning map is opposed on the basis of the level of prescription provided across the different areas of the Masterplan area. In particular, the densities associated with each of the LDR, MDR, and HDR are opposed, along with the anticipated variation of development of different activities in the local Shopping and Town centre Zones.
- 11 The Structure Plan is opposed on the basis of the level of prescription provided across different areas of the Masterplan area. It is unrealistic to expect that the multitude of landowners across the Masterplan area will be able to achieve this level of detail through multiple development / consent applications in the future. The prescription will not provide for creative and high quality design outcomes, which respond to evolving community desires and needs. In particular, the structure plan details which are opposed include:
 - (i) Identified infrastructure requirements which do not take into account landowner boundaries or commitments to development, such as roading, stormwater, underpass and active links;
 - (ii) Open space, tree protection and stormwater management areas – which are not based upon a detailed effects assessment as to the needs of these to be retained, their size or location. There has also been no acknowledgement as to what management structures will be in place in the future, or what compensation will be made to landowners who are subject to these overlays, which will effectively prohibit any development or use of this land.
 - (iii) Identified sub-areas which are based upon an arbitrary grid-like pattern of development will not provide for creative or responsive urban planning, or take into account different land ownership needs and aspirations.

- 12 The proposed building height structure plan is opposed on the basis of the significant heights that are anticipated across the structure plan area. These heights are considered to be inconsistent with local amenity and not reflect community needs, culture, and history.
- 13 The Submitter seeks that the above plans be deleted and that the rezoning of the Submitter land, and surrounding land within the Masterplan be a mixture of densities ranging between rural residential / precinct, LLR, LDR, and MDR.

Specific issues – inflexibility, density and infrastructure across all proposed chapters:

- 14 The requirements across chapters 27, 7, 8, 9 to achieve an expected density within each zone or sub area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices (27.9.8.1(f)) should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.
- 15 Specific provisions across Chapters 27, 7, 8, and 9 relating to the provision of infrastructure prior to development proceeding do not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 16 The Submitters request that these requirements be deleted, and if replaced, are left to general controls in the subdivision chapter as to requirements for the upgrade and install of requisite infrastructure. In practice, necessary infrastructure can be designed and implemented on a development needs basis, and with private agreements between landowners if need be. The current level of prescription will have the perverse outcome of stagnating residential development.
- 17 Prescriptive wording used to achieve urban design outcomes across all chapters 27, 7, 8, and 9 is opposed. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom-line approach. This could have the adverse consequence of limiting development options, timeliness and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.

Decision sought:

- 18 The Submitter seeks the following decisions from the QLDC:
 - (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
 - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
 - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
 - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;

- (ii) Rezoning takes into account and provides for the community needs of limited and small scale / sensitively designed supporting zoning such as commercial and local shopping centre zoning, plus education and recreational opportunities;
 - (iii) Any such rezoning take into account a realistic amount of additional residential development that is supported by NZTA and which provides for an equitable outcome of development shared across different landowners in the area;
 - (iv) Requirements for infrastructure upgrades be realistic and proportionate to the development proposed and take into account past contributions made by existing landowners;
 - (v) Affordable housing and development contribution requirements are realistic and equitable such as to not dissuade affordable and efficient development of the land to market;
 - (vi) Structure plan restrictions on development, such as infrastructure areas, protected trees and recreation, be equitably offset / compensated with landowners.
- (d) Any further amendments to affordable and community housing contributions, or inclusionary zoning sought to be progressed through a planning variation or change should be progressed at the same time as this rezoning / master planning proposal.
- (e) The Submitter seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.

19 The Submitter wishes to be heard in support of this submission.

20 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

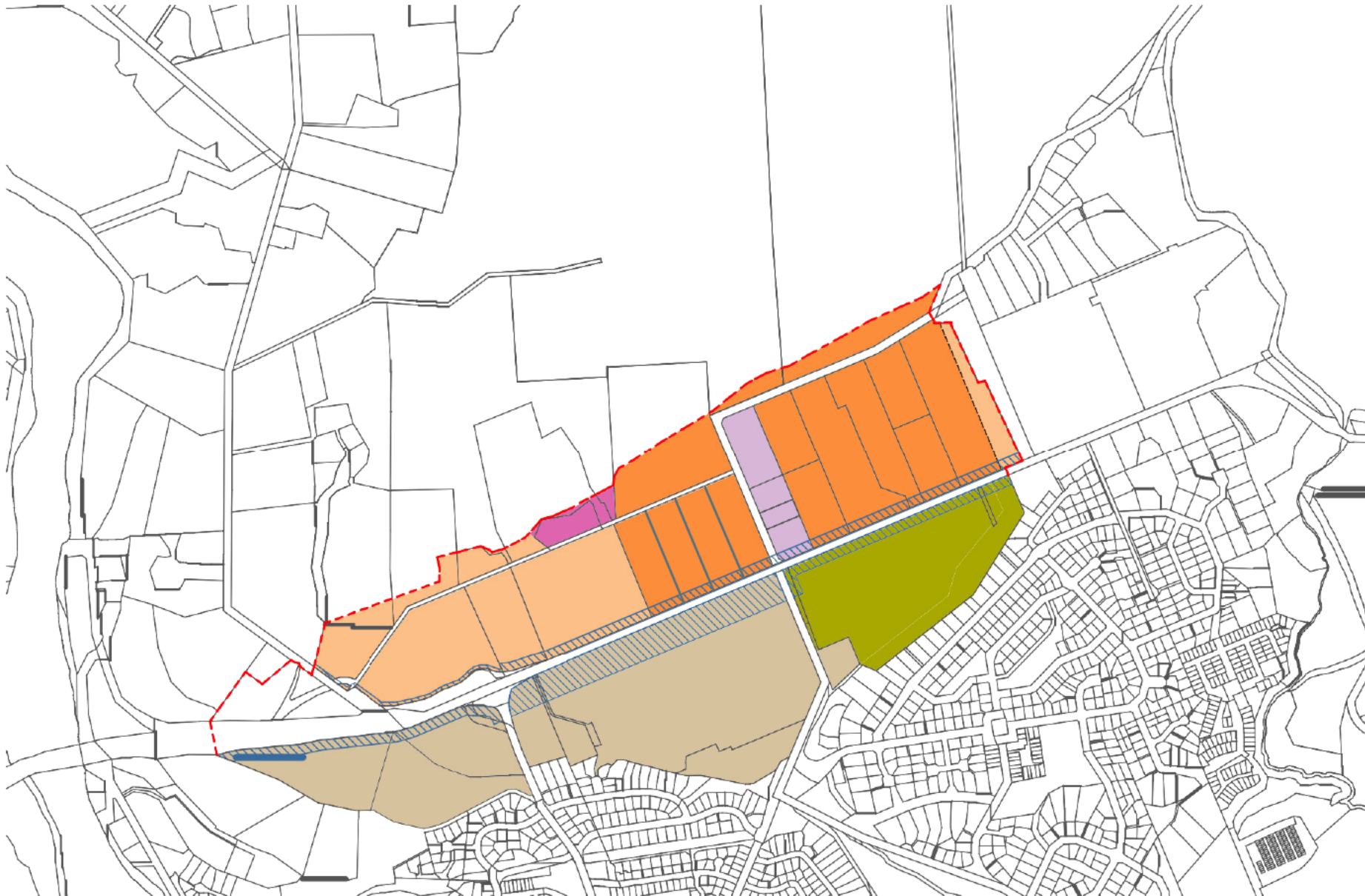
28 May 2021



Shotover Country No. 2 Limited
Signed by their duly authorised agents
Anderson Lloyd
Per: Maree Baker-Galloway
Address for service: [REDACTED]

Te Pūtahi Ladies Mile Zoning Plan

1:10,000 @ A3
1:5,000 @ A1
100m 200m



- Key**
- Urban Growth Boundary Extension
 - Building Restriction
 - Town Centre
 - Local Centre
 - High Density Residential
 - Medium Density Residential
 - Lower Density Residential
 - Open Space - Community Purposes



26 May 2021

Queenstown District Council
10 Gorge Road
QUEENSTOWN

RE:Ladies Mile Master Plan Process

The Roman Catholic Diocese of Dunedin (RCDD) registered at the outset with Queenstown Lakes District Council (QLDC) as an interested party with regard to the Ladies Mile Masterplan Project. Consultation with QLDC planners and Council appointed planners Brown and Company was undertaken (see attached email correspondence with Christine Edgely of Brown and Company Planning Group).

The RCDD indicated that we were interested and committed to relocating St Joseph's School to the new Ladies Mile development and would require approximately 3 hectares of land zoned for a new 300 pupil school and church. St Joseph's is a State-Integrated school and a part of the education network funded by the Government through the Ministry of Education. The RCDD indicated they were prepared to work with the Ministry of Education (MOE) and consider a co-location arrangement. The RCDD indicated that they were committed to a timeline of 5 years to have a new school up and running.

When the first early concept plan was released a 3ha Primary School site was proposed and RCD naturally thought it was for St Joseph's School, but have subsequently been informed that the two school sites proposed are both for the MOE. MOE apparently advised QLDC that they were not interested in a co-location with RCDD.

St Joseph's has not been considered in the current revision of the masterplan. St Joseph's currently has 15% of its pupils (37 in total) in Inner Queenstown and 85% of pupils (87 in total) reside and commute daily from Frankton, Shotover Country, Lake Hayes and Arrowtown, so by relocating to Ladies Mile we will reduce the daily commute to and from Queenstown by 70%. This will have a positive outcome for the transportation modelling on the daily flows at peak times on the State Highway to Queenstown.

Our modelling, based on QLDC and MOE projections, will see the demand for an increased provision for Catholic education in the QLDC area. Relocating to the Ladies Mile area is the logical move for us, as the majority of population growth is not at the Queenstown end of the region, where the St Joseph's is currently located. The expected level of growth would more than treble the transportation demands the school community places on the route in and out of Queenstown.

Over and above this the QLDC projections estimate that by 2051, the Wakatipu Basin will have a population similar to that of Invercargill, which has 4 Catholic Primary Schools and one

Catholic Secondary School. The Census data shows that 9% of the total population are Primary School age and of this 8.5% identify as Catholic. If these figures are applied to the projected population of 49,230, we could expect demand for Catholic schooling in the vicinity of 375 children, which is not feasible on the current site.

Decision Required: That the QLDC make accommodation in the masterplan for the Ladies Mile for another school site, and accordingly make the necessary rule changes in their District Plan Variation to achieve this outcome.

Yours sincerely

A handwritten signature in cursive script, appearing to read 'M J Dooley'.

+ Michael J Dooley DD
Bishop
Roman Catholic Diocese of Dunedin

From: Christine Edgley [REDACTED]
Sent: 10 May, 2021 3:50 PM
To: Sydney Brown [REDACTED]
Subject: Ladies Mile Masterplan - consultation

Hi Syd,

I trust this email finds you well.

Following up from previous consultation on early concept plans for the Te Putahi Ladies Mile Masterplan in November last year, the Council has now released a draft preferred Masterplan and associated draft plan variation for public feedback.

All the information can be viewed online at Council's Let's Talk page (<https://letstalk.qldc.govt.nz/ladies-mile-masterplan>) and you can undertake a survey on both the draft Masterplan and the draft planning variation via the same link.

Feedback is open until 5pm, **28 May 2021**.

Kind regards,
Christine

Christine Edgley
Resource Management Planner
[REDACTED]


BROWN & COMPANY
P L A N N I N G G R O U P

This message contains confidential information and is intended only for the recipient. If you are not the recipient you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

From: Sydney Brown <Sydney.Brown@highlandparkmosgiel.co.nz>
Sent: Monday, November 16, 2020 8:05 AM
To: Christine Edgley <Christine@brownandcompany.co.nz>
Cc: Gerard Aynsley <gerarda@cdd.org.nz>
Subject: RE: Ladies Mile - early concept plans for Public Open Days

Hi Christine

Thanks for the concept plans. On behalf of the Catholic Diocese the proposed school sites all work for us ,our first choice would be option A as this gives the opportunity of co-location and sharing of

costs. Option B & C ,the only concern we have is connectivity ,as the transport plan only shows public transport on the shotover country side of Ladies Mile.
Can you please forward me the final plan when it is publicly released.
If you require any further input from me don't hesitate to ask.

Regards, Syd

Syd Brown
Managing Director
Cranbrook Properties Ltd

[REDACTED]

From: Christine Edgley [REDACTED]
Sent: 13 November, 2020 11:34 PM
To: [REDACTED]
Subject: Ladies Mile - early concept plans for Public Open Days

Good evening Syd,

I understand that you requested to be sent a copy of the information for the material presented at the Public Open Days for the Ladies Mile Masterplan project.

Please find a link below to the Council's Let's Talk page, which includes the early concept plans:

<https://letstalk.qldc.govt.nz/ladies-mile-masterplan>

Kind regards,
Christine

Christine Edgley
Resource Management Planner

[REDACTED]



BROWN & COMPANY
P L A N N I N G G R O U P

This message contains confidential information and is intended only for the recipient. If you are not the recipient you should not disseminate, distribute or copy this e-mail. Please notify the sender immediately by e-mail if you have received this e-mail by mistake and delete this e-mail from your system. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. The sender therefore does not accept liability for any errors or omissions in the contents of this message, which arise as a result of e-mail transmission. If verification is required please request a hard-copy version.

28 May 2021

Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions Feedback
Queenstown Lakes District Council
via email: letstalk@qldc.govt.nz

To whom it may concern

Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions: Feedback of Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited

Thank you for the opportunity to provide a feedback on the Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions. This feedback is on behalf of Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited (the **Syndicate**).

Summary of feedback

The Syndicate owns land at Ladies Mile within the masterplan area. The Syndicate supports the concept of master-planning for Ladies Mile, however it does not support the current masterplan as drawn.

Matters supported

- Draft zoning map that shows the Syndicate's land zoned a mix of high and medium density residential.
- The general approach of the design principles.
- Building heights depicted in the masterplan.
- Use of the existing planning framework with adaptations as required to recognise the higher density of residential development to be enabled at Ladies Mile.

Matters not supported

- The location of the high school.
- Small area of residential on the Syndicate's land.
- Masterplan layout in the vicinity of the town centre.
- Limits on overall yield.
- Prescriptive nature of several of the rules/standards.
- Activity status for non-compliance with several of the rules/standards.

The Syndicate's preference is for the masterplan to be redrafted to align with earlier consultation options A and B. Further detail on these matters are expanded on below.

Introduction

The Syndicate owns 4.5 hectares of land at 497 Frankton-Ladies Mile Highway, shown in Figure 1 below. The Syndicate has owned the land since November 2018 and it is currently used as a boutique visitor accommodation lodge.



Figure 1: 497 Frankton-Ladies Mile Highway

The Syndicate is committed to developing this site for medium and high density housing in the short to medium term. Developing the land in this way will contribute to the overall delivery of the Council's goals for urbanising Ladies Mile.

The Syndicate supports the Council's initiative of master-planning this area, and has engaged with the Council's team on this process, including providing feedback on the draft Ladies Mile Masterplan options formally via letter and informally in meetings with the Ladies Mile Consortium team.

Feedback on Te Pūtahi Ladies Mile Draft Masterplan

The Syndicate does not support the masterplan in its current form. The key areas of concern are:

1. The location of the high school.
2. The lack of residential land shown on the masterplan at 497 Ladies Mile Highway.

An overlay of the draft masterplan and the Syndicate's land is shown in Figure 2 below.



Figure 2: 497 Frankton-Ladies Mile Highway (shown by red border) overlaid on snip from the draft masterplan

High school location

As Figure 2 shows, the draft masterplan shows the high school and associated open space located over the majority of the Syndicate's site, with a small area of residential land in the northern part of the site. This is a significant change from the previous iterations of the draft masterplan that showed a mix of medium and high density residential in this area.

Given the plans outlined above in relation to the Syndicate's development intentions for its site (that have been conveyed to the Council in previous feedback), the Syndicate is disappointed to see the high school located in this location. The Syndicate will not be able to deliver its intended medium-high density residential development if this land is taken for school purposes. The Syndicate seeks that the high school be moved from its land.

Previous consultation versions of the masterplan showed the high school further to the east (Option A) or across the road at 516 Frankton Ladies Mile Highway (Option B). The Syndicate considers 516 Frankton Ladies Mile Highway to be the most appropriate and practical site as the high school can be collocated with the bus interchange and playing fields. In terms of the specifics of Option B in relation to the Syndicate's land, this is not supported due to the location of a park over part of its land and consequential impact on residential development feasibility. The Syndicate therefore provided feedback in support of Option A during the earlier consultation period and this masterplan is still supported by the Syndicate.

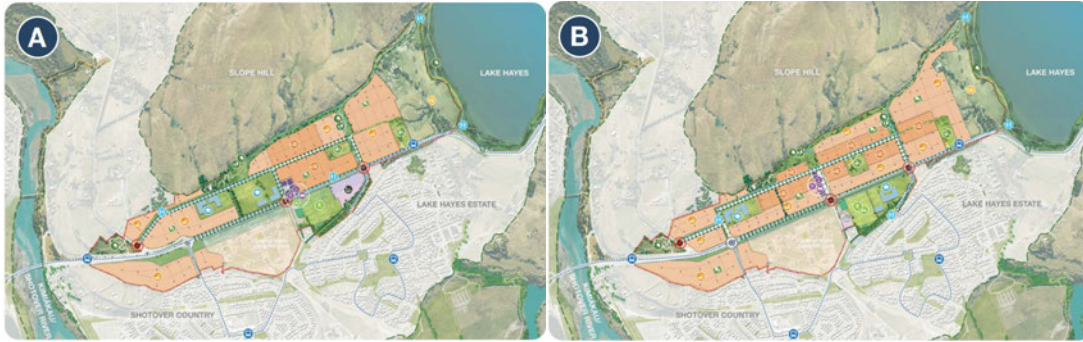


Figure 3: Earlier versions of the masterplan – Public Open Days Masterplan Options A and B

Location of residential land

The Syndicate requests that all of its land be shown as residential on the masterplan. Under the current masterplan, the residential part of its site equates to just over one hectare, or approximately 23%. Developing only one hectare significantly undermines the feasibility of any future development plan in terms of the economies of scale that would otherwise be achieved. The current masterplan therefore creates a risk that this part of the masterplan area will remain undeveloped. This is at odds with the overall intent of the masterplan and principles. As previously conveyed to Council in its submission on the draft Queenstown Lakes Spatial Plan, part of ‘unlocking’ the potential of the Ladies Mile area requires landowners who are motivated to deliver on the Council’s masterplan.

Other matters

Zoning

The masterplan contains a draft zoning map, which shows the Syndicate’s land as a mix of high and medium density residential. The Syndicate supports this draft zoning. One of the key features noted on the zone map that forms part of the masterplan is that ‘zoning supports anticipated land use’. Given the Syndicate’s plans for residential development on the site, the Syndicate supports the mix of high and medium density zoning on its site as per this draft zoning map.

The town centre and surrounding land use

In order for the town centre to be a successful and vibrant hub, it will require a critical mass of people living nearby. However, the town centre is currently adjoined by expansive stormwater and reserves/open space to north and east. The Syndicate considers it more appropriate to locate high density residential activity in and immediately adjacent to the centre to contribute to vibrancy. The high school and associated open space will not contribute to town centre vitality or vibrancy.

Design principles

The Syndicate supports the seven design principles, and in particular Principle 6 ‘Do density well, provide quality and diverse housing’. The Syndicate considers Ladies Mile has the potential to provide a significant and unique contribution to much needed supply and diversity of housing in Queenstown. The built form outcomes and increased heights and densities over what is typically delivered in the wider Queenstown urban context is supported.

Height, setbacks and yield

Syndicate seeks maximum flexibility for development. The Syndicate supports increasing the height beyond what is currently enabled by the PDP to 24.5 metres in high density areas and 13 metres in medium density areas.

The Syndicate does not support the 20 metre amenity access area and building restriction area adjoining State Highway 6. While this is a significant improvement on the current setback requirements, the Syndicate considers there are opportunities to further reduce this and still maintain the gateway environment of Ladies Mile. A reduction in this setback will assist in providing landowners by providing flexibility.

It is understood that the residential yield at Ladies Mile is limited by traffic and transport infrastructure constraints, including the capacity of the Shotover River bridge on State Highway 6. The Syndicate considers this issue must be addressed and transport challenges should not be the determinant of yield in this or any other location.

Feedback on the Draft Planning Provisions

The Syndicate agrees is its most efficient and effective to utilise the existing PDP provisions, with some adaptations to ensure that the unique outcomes anticipated at Ladies Mile can be delivered. The Syndicate is generally supportive of the relatively enabling draft provisions. This includes the additional height allowance for the medium and high density zones, removal of minimum lot size, and exemption from the minimum dimension requirement, for example.

In relation to height, the Syndicate notes that the structure plan building heights plan does not appear to align with the height mapping set out in the draft masterplan (several areas that should be subject to the 24.5m height limit are shown as black (this may be a printing error due to the additional hatching shown)).

The Syndicate considers there are other opportunities to make the provisions more enabling. This includes a controlled activity status for development in accordance with the structure plan (as opposed to restricted discretionary), and increasing the maximum building coverage standard.

The Syndicate does not support the minimum average density requirement (40 units per hectare) and minimum number of stories, as the preferred density will be driven by market demand and what is feasible to achieve. The Syndicate does not support the activity status of non-complying to breach the standard and considers restricted discretionary activity status to be more appropriate. Matters of discretion could include the extent of infringement, size of units, opportunity to make up the shortfall elsewhere, viability of achieving the 40 unit average, and the like.

While infrastructure delivery and land use planning must be integrated, as noted earlier, the Syndicate does not agree that infrastructure constraints should be the driver of residential yield in such a critical location. To this end, the Syndicate does not support the inclusion of provisions that development cannot proceed until various infrastructure items are provided for (e.g. Rules 7.5.20, 8.5.41 and 9.5.36).

With regard to activity statuses, as noted, the Syndicate would prefer to see as much flexibility built into the provisions as possible to facilitate development. This would be better achieved by having restricted discretionary activity status for breach to standards throughout the provisions, rather than non-complying.

Summary

The Syndicate supports the Council's initiative to masterplan Ladies Mile. The Syndicate does not support the current location of the high school, and requests that the masterplan be amended to show high and medium density residential development over the entirety of its site at 497 Ladies Mile Highway. The Syndicate supports the overall enabling direction of the draft planning provisions, and considers these could be further developed to ensure maximum flexibility for motivated landowners to deliver much needed residential capacity and choice in Queenstown.

Please contact me should you require further information or clarification of the matters raised in this feedback.

Yours sincerely

Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited



Peter McConnell

General Manager: Performance & Planning
On behalf of E+O Property Syndication Limited

Contact

Please contact E+O Property Syndication Limited for more information.

Graeme Gunthorp
Charles Beale



Submission on Te Pūtahi Ladies Mile Masterplan

To: Queenstown Lakes District Council
letstalk@qldc.govt.nz

Submitter: Maryhill Limited
[REDACTED]

This submission is made on behalf of Maryhill Limited (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (**RMA**)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, outlined in red on the zoning map attached as **Appendix A**.

Parts of the masterplan and planning provisions that this submission relates to:

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
 - (a) Chapter 27 – subdivision and development;
 - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
 - (c) Chapter 8 Medium Density Residential;
 - (d) Chapter 9 – High density Residential;
 - (e) Chapter 15 – Local Shopping Centre Zone;
 - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
 - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

Reasons for submission:

- 4 Specific recommendations to the notified chapter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

Process:

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 9 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

Zoning map and structure plan area:

- 10 The northern boundary of the structure plan outline is sought to be amended to follow a refined ONL identification, based upon a finer grained assessment of the topography and values of this landscape unit. The extent of the proposed Structure Plan / Zoning Map should follow this refined boundary. This ONL is yet to be tested through the District Plan Review process and is not based upon a detailed landscape assessment. Within this location there is potentially further suitable land for further residential and lifestyle development, which is consistent with the intentions of the Te Pūtahi Ladies Mile Masterplan process. The Submitter seeks the ONL be amended and that developable land outside of the amended ONL be rezoned for either rural living (residential or precinct), or LDR, LLR, or included in the Masterplan if the process is to continue to RMA notification. The Submitter also seeks that the UGB be amended to align with the amended ONL.
- 11 The Zoning map is opposed on the basis of the level of prescription provided across the different areas of the Masterplan area. In particular, the densities associated with each of the LDR, MDR, and HDR are opposed, along with the anticipated variation of development of different activities in the local Shopping and Town centre Zones.
- 12 The Structure Plan is opposed on the basis of the level of prescription provided across different areas of the Masterplan area. It is unrealistic to expect that the multitude of landowners across the Masterplan area will be able to achieve this level of detail through multiple development / consent applications in the future. The prescription will not provide for creative and high quality design outcomes, which respond to evolving community desires and needs. In particular, the structure plan details which are opposed include:

- (i) Identified infrastructure requirements which do not take into account landowner boundaries or commitments to development, such as roading, stormwater, underpass and active links;
 - (ii) Open space, tree protection and stormwater management areas – which are not based upon a detailed effects assessment as to the needs of these to be retained, their size or location. There has also been no acknowledgement as to what management structures will be in place in the future, or what compensation will be made to landowners who are subject to these overlays, which will effectively prohibit any development or use of this land.
 - (iii) Identified sub-areas which are based upon an arbitrary grid-like pattern of development will not provide for creative or responsive urban planning, or take into account different land ownership needs and aspirations.
 - (iv) Lack of integration with adjacent rural and rural living development / land uses. The submitters are concerned with the significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill. The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 13 The proposed building height structure plan is opposed on the basis of the significant heights that are anticipated across the structure plan area. These heights are considered to be inconsistent with local amenity and not reflect community needs, culture, and history.
- 14 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters
- 15 The Submitter seeks that the above plans be deleted and that the rezoning of the Submitter land, and surrounding land within the Masterplan be a mixture of densities ranging between rural residential / precinct, LLR, LDR, and MDR.

Chapter 27 – Subdivision:

- 16 Provisions pertaining to requiring development be consistent with the structure plan are overly prescriptive and will not provide for a high quality design-led and responsive planning outcomes. Such provisions include, 27.9.8.1b, c, d, e. The requirement to achieve an expected density within each zone or sub area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices (27.9.8.1(f)) should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.
- 17 It is considered that a much more simplified regime for subdivision can be achieved through a concise statement of objectives, policies, and assessment matters which seeks to achieve an integrated and high quality mixed urban / residential outcome for the area.

- 18 The Submitters seek that subdivision to densities requested by the Submitter are controlled or restricted discretionary, with matters of control limited to those currently included in the LDR, LLR, MDR and rural living Zones of the PDP.
- 19 There is a lack of acknowledgement, and integration with, existing rural lifestyle / rural residential and rural land adjacent to Ladies Mile. The effects on these owners and the existing high quality developments need to be considered and responded to in future development.

Chapter 7 – Low Density Residential:

- 20 7.5.20 – infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 21 The Submitters request that these requirements be deleted, and if replaced, are left to general controls in the subdivision chapter as to requirements for the upgrade and install of requisite infrastructure. In practice, necessary infrastructure can be designed and implemented on a development needs basis, and with private agreements between landowners if need be. The current level of prescription will have the perverse outcome of stagnating residential development.

Chapter 8 – Medium Density residential:

- 22 Objective 8.2.12 – is unclear in its current expression in that it is uncertain what 'greater' intensity and diversity of housing is being compared to (i.e. whether this is other zones, or other MDR zoned areas than Ladies Mile). The intention of greater 'intensity' and diversity of housing to achieve a modal transport shift is also opposed on the basis that this has been queried, and not supported by, the NZTA.
- 23 Policy 8.2.12.1 – is opposed on the basis of the prescriptive wording used to achieve urban design outcomes. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom-line approach. This could have the adverse consequence of limiting development options, timeliness, and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.
- 24 Policy 8.2.13 is supported, subject to deleting reference to 'urban', and also referencing adjacent rural lifestyle, rural residential and rural land. Given that existing Shotover Country and Lake Hayes Estate Submissions are residential. The integration with those existing communities necessitates a lower overall density and intensity of development at Ladies Mile than is currently anticipated in the draft masterplan. Furthermore, it is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development.
- 25 Policies 8.2.13.1 – 8.2.13.3, Rule 8.4.28, Rule 8.5.20 – requirements to adhere to the structure plan, and associated non-complying activity status for non-conformity, are opposed on the basis these are overly prescriptive, will have the perverse effect of delaying development, and will not encourage innovative design led outcomes.

- 26 Infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 27 Rule 8.5.21, 8.5.22, 8.5.24, 8.5.26, 8.5.27, 8.5.29, – density, building coverage, heights and outdoor living spaces – these provisions are generally opposed for the reasons as outlined above, opposing the overall increased intensity of development. A minimum density to be achieved (at 40 dwellings per hectare) is significantly greater than what is anticipated in this location, and there has been no evidence provided that this is what the market is seeking. No evidence has been provided to support whether this type of development is feasible or affordable and it is considered it will have the perverse outcome of delaying development of affordable and high quality housing.
- 28 Rule 8.5.41 – infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 29 Assessment matters:
- (a) *8.7.a context and character* – should equally refer to integration with and responding sensitively to adjacent development (which includes rural land uses, rural living, and low and medium density residential subdivisions).
 - (b) *8.7f sustainability and resilience* – while the intention of this assessment matter as an aspirational goal is supported, the current wording does not take into account other alternative contributions to sustainable outcomes such as creation of open space and reserve contributions that are achieved through development.

Chapter 9 – High Density Residential:

- 30 Objective 9.2.9 - is unclear in its current expression in that it is uncertain what 'greater' intensity and diversity of housing is being compared to (i.e. whether this is other zones, or other HDR zoned areas than Ladies Mile). The intention of greater 'intensity' and diversity of housing to achieve a modal transport shift is also opposed on the basis that this has been queried, and not supported by, the NZTA.
- 31 Policies 9.2.9.1 - is opposed on the basis of the prescriptive wording used to achieve urban design outcomes. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom line approach. This could have the adverse consequence of limiting development options, timeliness and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.
- 32 9.2.10 – 9.2.10.3 - Provisions pertaining to requiring development be consistent with the structure plan are overly prescriptive and will not provide for a high quality design-led and responsive planning outcomes. The requirement to achieve an expected density within each zone or sub

area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.

- 33 Within the HDR provisions there is no acknowledgement of the need to integrate with adjacent rural lifestyle, rural residential and rural land uses (such as Threeewood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development. There should be further acknowledgement of a design response to, and integration with, existing residential subdivisions of Lake Hayes estate and Shotover Country.
- 34 Rules 9.4.21, 9.5.18, 9.5.19, 9.5.20, 9.5.23, 9.5.24, 9.5.25, 9.5.27, density, building coverage, heights and outdoor living spaces (etc) – these provisions are generally opposed for the reasons as outlined above, opposing the overall increased intensity of development. A minimum density to be achieved (at 70 residential units per hectare) is significantly greater than what is anticipated in this location, and there has been no evidence provided that this is what the market is seeking. No evidence has been provided to support whether this type of development is feasible or affordable and it is considered it will have the perverse outcome of delaying development of affordable and high quality housing.
- 35 9.5.36 –infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 36 9.7 Assessment matters
- (a) *9.7.a context and character* – should equally refer to integration with and responding sensitively to adjacent development (which includes rural land uses, rural living, and low and medium density residential subdivisions).
- (b) *9.7f sustainability and resilience* – while the intention of this assessment matter as an aspirational goal is supported, the current wording does not take into account other alternative contributions to sustainable outcomes such as creation of open space and reserve contributions that are achieved through development.

Local Shopping Centre Zone and Te Putahi Ladies Mile Town Centre Zones:

- 37 The Submitter supports some form of mixed use and commercial development within the Ladies Mile masterplan and generally in the locations identified. However given these zones are not over the Submitter's land, detailed submissions have not been provided on the draft planning provisions.
- 38 The general intention of the Submitter, and relief sought in respect of these zones is that:
- (a) Mixed commercial and local shopping centre activities are provided for, to the extent that these integrate with a lower density of development and respond sensitively to surrounding rural land and landscapes;
- (b) School, recreation and public amenity opportunities are provided for, but are not overly prescribed into the masterplan in terms of eventual locations and extent.

Higher order provisions and consequential amendments:

- 39 4.2.2.21(b) - References to urban, medium and high density residential development is opposed on the basis of the above submission; the Submitter seeks that a lower range of densities and mixed development opportunities be supported to enable greater supply and diversity of choice in the housing market. 4.2.2.21(d) and (e) Contribution to public transport as a preferred method of travel is unlikely to be able to be achieved through subdivision housing development and should therefore be deleted.

Chapter 29 – Transport:

- 40 Based on the contents of this submission, standalone dwellings and lower residential density is supported, therefore maximum parking spaces (Rule 29.5.14, 29.5.2X) which do not provide for even one parking space for a 1 bedroom apartment are unlikely to work in practice. Worker accommodation from the tourism sector is an area which is in shortage in the District, and many of those workers will not be able to work within Ladies Mile. The restrictions on parking and the anticipated lack of external movements over the Shotover Bridge will mean that worker accommodation for key sectors will continue to be in demand, and this rezoning will not alleviate such social pressures.

Decision sought:

- 41 The Submitter seeks the following decisions from the QLDC:
- (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
 - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
 - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
 - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;
 - (ii) Rezoning takes into account and provides for the community needs of limited and small scale / sensitively designed supporting zoning such as commercial and local shopping centre zoning, plus education and recreational opportunities;
 - (iii) Any such rezoning take into account a realistic amount of additional residential development that is supported by NZTA and which provides for an equitable outcome of development shared across different landowners in the area;
 - (iv) Requirements for infrastructure upgrades be realistic and proportionate to the development proposed and take into account past contributions made by existing landowners;
 - (v) Affordable housing and development contribution requirements are realistic and equitable such as to not dissuade affordable and efficient development of the land to market;
 - (vi) Amendment of the ONL boundary at the base of Slope Hill such that developable land is included in the Masterplan and rezoned.

- (vii) Amendment of the UGB to align with the amended ONL.
 - (viii) Structure plan restrictions on development, such as infrastructure areas, protected trees and recreation, be equitably offset / compensated with landowners.
 - (d) Any further amendments to affordable and community housing contributions, or inclusionary zoning sought to be progressed through a planning variation or change should be progressed at the same time as this rezoning / master planning proposal.
 - (e) The Submitter seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.
- 42 The Submitter wishes to be heard in support of this submission.
- 43 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

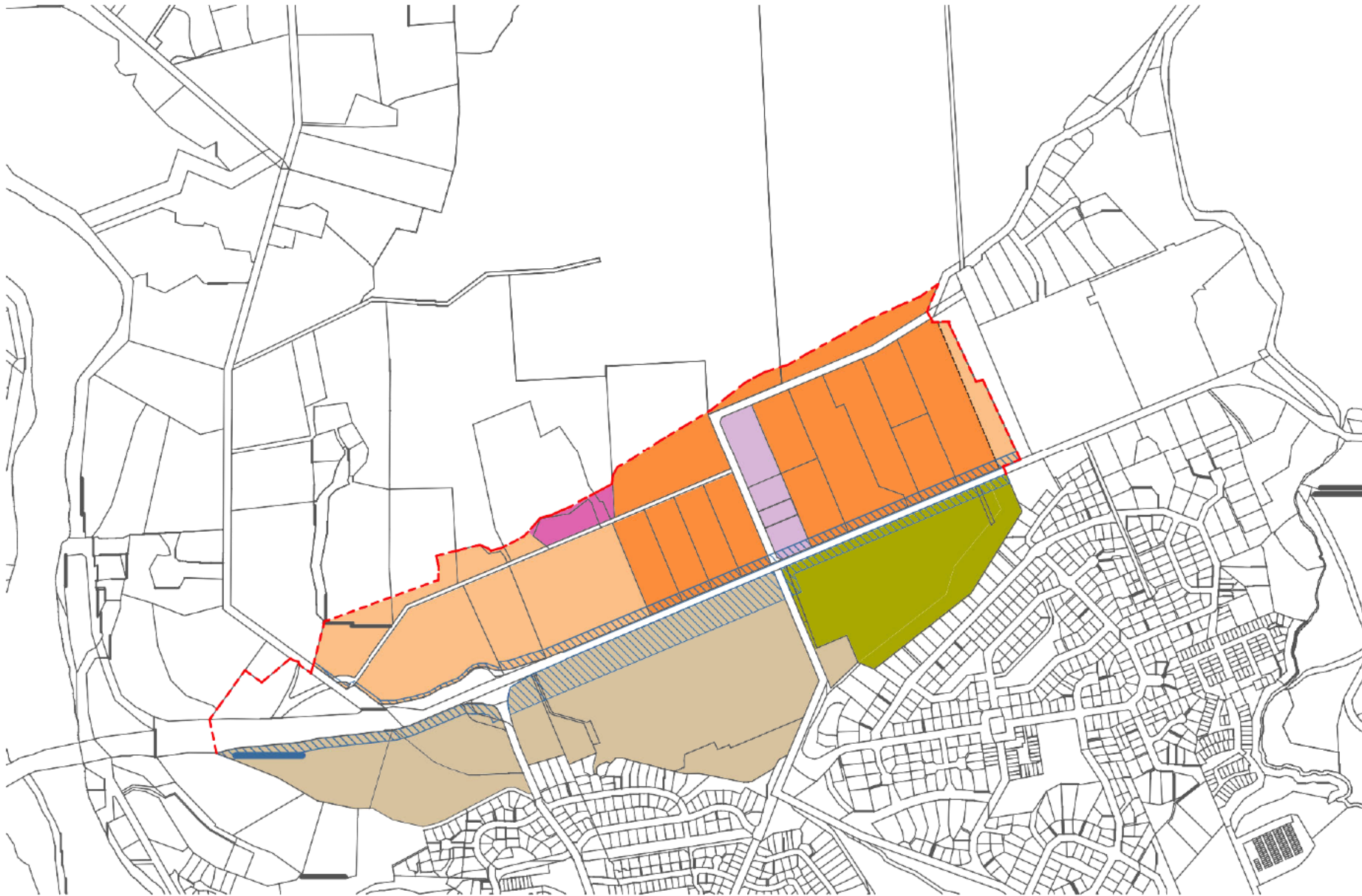
28 May 2021



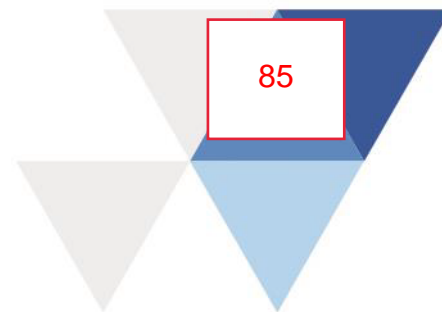
Maryhill Limited
Signed by their duly authorised agents
Anderson Lloyd
Per: Maree Baker-Galloway
Address for service: [REDACTED]

Te Pūtahi Ladies Mile Zoning Plan

1:10,000 @ A3
1:5,000 @ A1
100m 200m



- Key**
- Urban Growth Boundary Extension
 - Building Restriction
 - Town Centre
 - Local Centre
 - High Density Residential
 - Medium Density Residential
 - Lower Density Residential
 - Open Space - Community Purposes



Feedback on the Queenstown Lakes District Council’s draft Te Pūtahi Ladies Mile Masterplan and draft Planning Provisions to the Proposed Queenstown Lakes District Plan for Te Pūtahi Ladies Mile

To: Queenstown Lakes District Council

Name of submitter: Ministry of Education ('the Ministry')

Address for service: C/- Beca Ltd
PO BOX 13960
Christchurch 8141

Attention: Hugh Loughnan

Phone: [REDACTED]

Email: [REDACTED]

This is the Ministry of Education’s ('the Ministry') feedback on the draft Te Pūtahi Ladies Mile Masterplan and draft Planning Provisions to the Proposed Queenstown Lakes District Plan for Te Pūtahi Ladies Mile by the Queenstown Lakes District Council.

The Ministry welcomes the opportunity to provide feedback on the draft Te Pūtahi Ladies Mile Masterplan (draft TPLMM) and draft Planning Provisions to the Proposed Queenstown Lakes District Plan (PDP) for Te Pūtahi Ladies Mile (draft DPP).

Background

The Ministry of Education is the Government’s lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government’s goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State integrated schools. For the Crown owned State school this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Queenstown Lakes district.



The draft TPLMM relevance to Ministry property:

The draft TPLMM sets out the spatial framework and direction for planning for growth in Te Pūtahi Ladies Mile area. The Ministry understands that the development is anticipated to enable up to potentially 2400 households. Of relevance to the Ministry is that to accommodate the anticipated growth from the proposed development and wider catchment, a new primary and secondary school site will be required. In this regard, the Ministry's expectation is that the secondary school will be required around 2030, with the primary school required around 2023, albeit dependent on the rate and growth of development within Ladies Mile.

In recognition of these requirements, the Ministry has undertaken a site identification and evaluation exercise for both schools, the key outcomes and findings of which have been discussed with the Ladies Mile Consortium during previous consultation. This evaluation process has involved a multi-criteria analysis methodology, with several sites evaluated across Ladies Mile against a broad range of criteria, including matters relating to technical ground conditions and natural hazards, location and proximity to student catchment, ease of acquisition, transportation, infrastructure, site constraints, social impacts and opportunities for co-location and shared facilities. The overall conclusion from the Ministry's evaluation was that the Ladies Mile locale displays a number of attributes that would support the provision of appropriate primary and secondary school facilities in a range of locations.

Overall, the Ministry is generally supportive of the aims of the draft TPLMM and commends the inclusion of educational facilities. The Ministry, however, considers that there are some potential co-location opportunities that should be explored in relation to the site at 516 Frankton Ladies Mile Highway owned by Queenstown Lakes District Council (QLDC). The Ministry understands that this land is indicated in the draft TPLMM as a Community and Sports Hub (including playing fields). The Ministry recognises the desire and necessity for community and recreation facilities in the area, however, considers that such facilities can be feasibly established on the site in conjunction with a secondary school. In this regard, the site would enable an opportunity to establish a wide range of accessible and quality facilities and activities for use by the community and students, as well as provide for the efficient utilisation of land across Ladies Mile.

The Ministry is increasingly embracing the opportunity for efficiencies and sharing public facilities, with a number of examples of co-location of facilities undertaken between the Ministry and other local authorities across the country. These include:

- The Peak Performance Centre, a new indoor sports shared facility between Rototuna Junior and Senior High schools and the Hamilton City Council,
- The Upper Riccarton Library, a shared community and school library operated by Christchurch City Libraries in collaboration with Riccarton High School and
- A current opportunity between Marlborough District Council and Marlborough Boys and Marlborough Girls College's which seeks to share recreational facilities.

In addition, Rototuna Junior and Senior High schools as well as Rolleston College are also located adjacent to council facilities; Rototuna Sports Park and Foster Park, respectively. It is considered that both from a community perspective and the Ministry's perspective, there are considerable benefits to co-location and shared facilities.



The Ministry's feedback:

Overall, the Ministry is generally supportive of the aims of the draft TPLMM and commends the inclusion of educational facilities.

However, the Ministry wishes to emphasise and express the opportunity of, and willingness to, investigate co-location of facilities with QLDC in relation to the site at 516 Frankton Ladies Mile Highway.

The Ministry's policies regarding its approach to working with schools, local authorities and other parties to establish agreements for sharing school facilities recognise that:

- The Ministry supports community use of school facilities where there is a public interest in doing so, in order to rationalise facility funding and reduce duplication and associated costs.
- The Ministry aims to support wider Government goals through provision of facilities for shared community use (e.g. health and wellbeing programmes; response to civil emergencies).
- There are opportunities for shared use that should be considered jointly by both the Ministry and school Board of Trustees, to ensure that the best outcome for schools and the wider community is investigated across the wider school network.

With regard to the draft DPP, and in order to not foreclose a co-location opportunity in relation to the site at 516 Frankton Ladies Mile Highway, the Ministry would support specific provision for education facilities and buildings (in much the same way as the specific provision for clubrooms within the Open Space and Recreation –Community Purposes Zone at Ladies Mile). This approach would also provide a consistent zone framework, noting that Objective 38.7.1 and its supporting policies all take an enabling view towards 'community activities' (and subsequently educational activities) within the Open Space and Recreation Zone.

The Ministry looks forward to continuing to work closely with the Ladies Mile Consortium and QLDC to enable the development of educational facilities and provide for efficient land uses throughout the Queenstown Lakes District.

Should you have any more queries please do not hesitate to contact the undersigned as consultant to the Ministry.



Hugh Loughnan
Planner – Beca Ltd
(Consultant to the Ministry of Education)

Date: 28/05/2021