

QLDC Proposed District Plan Hearing – Stream 1

Willowridge Developments Limited/Orchard Road Holdings Limited Spoken Submission

Willowridge made submissions requesting that the entire District Plan review process be placed on hold until such a time as the parts of the plan not currently being reviewed (in particular the Township Zone and Business and Industrial Zone) are notified. We assume this submission will be subject to a future hearing but consider submissions seeking such relief should be heard first to determine whether or not the process should be put on hold. Willowridge's particular concern is that the Proposed District Plan seeks to set urban growth boundaries but does not make all the zoning options available to inform the extent of these boundaries. Willowridge questions how Urban Growth Boundaries can be set when they don't take into consideration industrial and business land, which is a fundamental 'urban' activity. The 2-stage approach taken by Council seems to be inefficient and disjointed.

STRATEGIC DIRECTION

Submissions 249.2 – 249.6

Willowridge submission 249.2 – 249.6 relates to objective 3.2.1.1 and related policies. The objective is *to recognise, develop and sustain the Queenstown and Wanaka central business areas as the hubs of New Zealand's premier alpine resorts and the District's economy.*

The policy framework effectively seeks to prioritise the promotion and growth of these central business areas.

Willowridge submitted that the reference to the 'Queenstown and Wanaka central business areas' in the objective and policies should be amended to 'Queenstown and Wanaka business and commercial areas.'

The Section 42A recommends that the Willowridge submission be rejected and suggests the wording of the objective be amended to: *Recognise, develop and sustain the Queenstown and Wanaka town centres as the hubs of New Zealand's premier alpine resorts and the District's economy.*

Willowridge submits that the objective and policies fails to recognise and protect other significant commercial areas within both Queenstown and Wanaka. In Wanaka, Willowridge is currently developing the Three Parks Special Zone, which includes both an 11ha commercial core and a 5ha business area. The Three Parks Commercial Core is intended to perform a different function from the Wanaka town centre by providing an area to meet the identified need for large format retail activity. The Business Subzone will provide for the establishment of a high quality business area. The first stage of this development is already underway to accommodate a hire centre and a fuel station. These areas, and their counterparts in Queenstown such as Remarkables Park, are of significant importance to the local economy. The existing town centres of both towns have become a focus for tourism and hospitality; however, it is areas such as Three Parks that will provide essential services and significant employment opportunities for the towns and be important economic hubs of the District.

We consider that by focusing on the central business areas, objective 3.2.1.1 is too narrow to meet the purpose of the RMA of protecting the economic well-being of the community. The economic well-being of the community is heavily reliant on the other key employment areas of the town and not solely the town centre. The objective and policies should reflect this.

The relief sought in the Willowridge submission proposes to broaden the objective by referring to 'Queenstown and Wanaka business and commercial areas' rather than 'Queenstown and Wanaka central business areas'. We consider that this change would achieve the purpose of the Act.

The Section 42A Report proposes to amend the reference to 'central business areas' to become 'town centres'. This change makes no difference to the intent of the objective but does bring it into line with the terminology of the Proposed Plan (i.e. central business areas are not defined in the Plan). There is no discussion on the Willowridge submission in the Section 42A report but there is recognition of various submissions seeking that the objective be amended to encompass Remarkables Park. As a result of these submissions a new objective and policy specific to the Frankton commercial area is suggested. Willowridge submits that the Three Parks area of Wanaka will be as significant to Wanaka as the Frankton area is to Queenstown in the lifetime of this District Plan. The District Plan should recognise this at a strategic level.

The proposed wording in the Willowridge submission would provide for the other significant commercial areas of both Frankton/Queenstown and Wanaka without the need for a new Frankton objective. We note that a combined objective and policies is the preferred approach of the Remarkables Park Limited¹.

Willowridge considers there are no costs to the amended provisions proposed in the submission. The benefit of the amendment is that the strategic commercial areas in both Queenstown and Wanaka are all recognised and protected through the objective and policies.

Submission 249.7

Willowridge submission 249.7 sought to delete policy 3.2.2.1.6. The policy reads:

Ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships, to reduce the incentive for land banking on order to address housing supply and affordability.

The Section 42A report proposes to delete this policy on the basis that it removes some replication. Willowridge supports the deletion of this policy but considers the grounds for removing the policy should be on the basis that zoning land based on ownership does not meet the objective of ensuring urban development occurs in a logical manner.

LANDSCAPE

Submission 249.9

Willowridge submitted in opposition of policy 6.3.1.3 of the Landscape section. The policy reads:

¹ Statement of Evidence of Jeffrey Andrew Brown; 29th February; section 4.4.

That subdivision and development proposals located within the Outstanding Natural Landscape or an Outstanding Natural Feature be assessed against assessment matters in provisions 31.7.1 and 31.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.

Willowridge requested that the words *'because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases'* are deleted from the policy.

Willowridge considers the wording of the policy is too restrictive. The ONL boundaries encompass large areas of land which may well include a number of locations that can accommodate some level of subdivision or development without resulting in adverse effects on the environment that are more than minor. Willowridge considers that the assessment matters will ensure a full and robust assessment of the effects of subdivision or development and the policy framework should not be worded so as to pre-empt this assessment. Willowridge does not consider there is sufficient analysis in the Section 32A report to justify this blanket restriction across the entire ONL areas and is concerned that the policy wording does not enable an effects-based assessment of subdivision and development.

Willowridge seeks that the amendments proposed in the submission are accepted.

Date: 10th March 2016