



## SUBMISSION ON THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN

*Under clause 6 of First Schedule, Resource Management Act 1991*

**To:** Queenstown Lakes District Council  
Private Bag 50072  
Queenstown 9348

**Submitter:** Streat Developments Limited  
c/- Tieke Consulting Ltd  
PO Box 39  
Arrowtown 9351

Streat Developments Limited ('SDL') submission relates to Stage 3 of the Queenstown Lakes District Plan review (the '**proposal**').

The specific provisions of the proposal that Streat Developments Limited's submission relates to are:

- Urban Growth Boundary for Lake Hawea settlement.
- Planning Map 17: Lake Hawea - zoning of a 16.8-hectare site south of Cemetery Road, known as "Domain Acres" (Lot 1 DP304937).
- Chapter 20 – Settlement Zone and consequential Variations to the Proposed District Plan ('PDP') Chapters.
- Chapter 27 – Subdivision and Development.
- Section 32 Reports.

SDL **opposes** the proposal as notified.

The reasons for the submission and decisions sought are set out in the **attached document** and the table contained in **Attachment 1**.

SDL could not gain an advantage in trade competition through this submission.

SDL wishes to be heard in support of this submission.

If others make a similar submission, Streat Developments Limited will consider presenting a joint case with them at a hearing.

**Shirley Ferguson**

On behalf of Streat Developments Ltd  
18 November 2019

## 1.0 Introduction

Streat Developments Limited ('SDL') owns a property known as "Domain Acres" on the southern side of the Lake Hawea settlement, within the Queenstown Lakes District.

The 16.8-hectare block of land is legally described as Lot 1 DP304937 (the 'Site'). A copy of the Record of Title is contained in **Attachment 2**.

SDL has plans to subdivide the site for residential housing. The site is zoned Rural Residential in the operative District Plan ('ODP') and in stage 1 of the proposed District Plan ('PDP'). The Rural Residential zone provides for subdivision with a minimum lot size of 4000m<sup>2</sup>.

SDL has resource consent approval to subdivide the site into 36 rural residential lots (4000m<sup>2</sup>) – ref: RM060010, ET060010 and RM181236. Stage 1 of this subdivision has s223 engineering approval (refer EA060010) and is currently under construction, including access off Cemetery Road. A copy of the Rural Residential 36 lot plan of subdivision is contained in **Attachment 2**.

## 2.0 Background

SDL lodged submissions on stage 1 and 2 of the Queenstown Lakes District Plan review - refer submission numbers #697 and #2311 respectively.

In stage 1 of the District Plan review the ODP Rural Residential zoning was carried over. SDL submission #697 sought the Rural Residential land south of Cemetery Road be rezoned to Township. This relief sought was rejected in the Council decision.

The notified stage 1 proposed District Plan Planning Map 17 did not include an Urban Growth Boundary ('UGB') for Lake Hawea settlement. The UGB line was added by the Council as part of the decision on stage 1 and subsequently shown on Planning Map 17. The proposed UGB line for the Lake Hawea settlement extends around the existing settlement area of Lake Hawea incorporating the area bounded by Lake Hawea (north), Domain Road (west), Cemetery Road (south) and Muir Road (east). The UGB line excluded the Domain Acres Rural Residential zoned land south of Cemetery Road.

SDL filed an appeal on stage 1 ref: ENV-2018-CHC-000086. Following mediation on Topic #16 Hawea Urban Growth boundary, SDL signed an agreement (dated 20 March 2019) which put on hold pursuing the relief in relation to the Township zoning and extending the Urban Growth Boundary until after notification of Stage 3 of the PDP.

## 3.0 Urban Growth Boundary at Lake Hawea

Chapter 4 – Urban Development sets out the objectives and policies for managing the spatial location and layout of urban development within the District. The objective is to use UGB's as a tool to manage the growth of larger urban areas within distinct and defensible urban edges (refer objective 4.2.1)<sup>1</sup>. The Upper Clutha Basin Specific Policies 4.2.2.22 and 4.2.2.23 are of particular relevance to the UGB at Lake Hawea settlement.

SDL seek the Lake Hawea settlement Urban Growth Boundary be moved to include the "Domain Acres" site, as shown on the map contained in **Attachment 3**. SDL submit that Cemetery Road is not an appropriate southern boundary and a more defensible urban edge can be created through urban design.

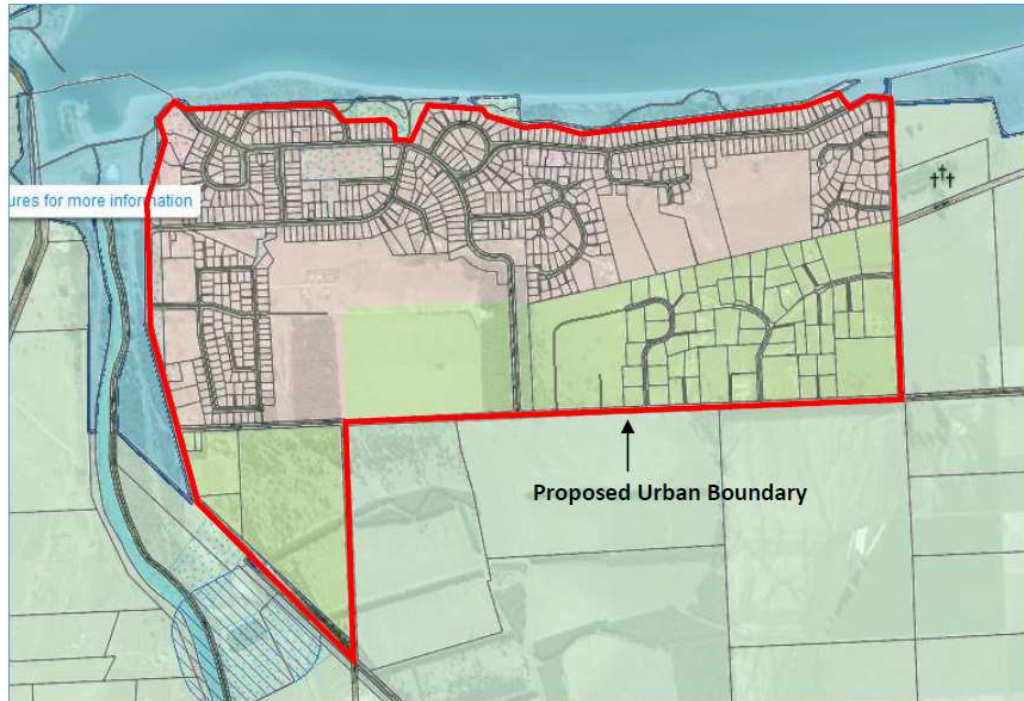
SDL submit that including the Domain Acre's site within the UGB is consistent with the PDP urban development objectives and policies for the following reasons:

- The site is currently zoned Rural Residential with the first stage of an approved 36 lot subdivision under construction. The Rural Residential subdivision and housing development will be accessed off the southern side of Cemetery Road with provision of urban services including reticulated water and wastewater. The density of this rural residential subdivision and housing development is more akin to township than rural.

<sup>1</sup> Queenstown Lakes District Council - Proposed District Plan Annotated Appeals Version (April 2019).

- The rural residential subdivision and housing development will appear part of the Lake Hawea settlement. The Domain acres site, once subdivided and developed, will form part of the existing urbanised area of Hawea settlement. Based on the Rural Residential zoning, SDL submit that the UGB should include the Domain Acres site.
- The Hawea Community Association ('HCA') have reviewed the Hawea Community Plan (2003) with updated version titled Hawea Community Plan Review (July 2015). The Hawea Community Plan Review (July 2015) recommended an urban boundary as shown in Figure 1 below.

**Figure 1: Hawea Community Plan (July 2015) - Proposed Lake Hawea Urban Boundary**



Source: HCA Hawea Community Plan Review (July 2015), Figure 3, page 7.

- The rural residential land has the potential to be more intensively developed to accommodate population increase. Based on a minimum lot size of 800m<sup>2</sup>, the site could accommodate 119 residential lots compared to 36 Rural Residential lots with a minimum lot size of 4000m<sup>2</sup>. SDL submit that an intensification of this Rural Residential land is consistent with the policy seeking to provide for predicted visitor and resident population increase in the Upper Clutha Basin over the planning period.
- SDL submit that Cemetery Road is a relatively weak boundary. The existing Rural Residential zoning with the minimum lot size (4,000m<sup>2</sup>) provides for subdivision and development south of Cemetery Road
- A more defensible southern urban edge could be created through urban design. The southern tip of the site extends into the Rural General with Domain Road and an unformed legal road providing the only separation. Provision of open space at the southern tip of the site would provide a buffer to the adjoining Rural General land.
- The inclusion of the site within the UGB will assist with avoid sprawling and sporadic urban development across the rural areas of the Upper Clutha Basin.

**Relief Sought:**

- 3.1 Planning Map 17 – The Urban Growth Boundary be moved south of Cemetery Road and include the “Domain Acres” site, as shown on the map contained in **Attachment 3**.
- 3.2 Any consequential amendments to give effect to this submission.

**4.0 Settlement / Residential Rezoning**

SDL seek the rezoning of the site from Rural Residential to Settlement zone. In the alternative, SDL seek a Residential zone that provides for low-density residential subdivision and development. The rezoning sought is referred to as **Settlement / Residential** and is shown on the structure and master plan contained in **Attachment 4** and **5**.

To provide a buffer to the Rural General land to the south and define the urban edge, open space is proposed in the southern triangle, as shown on the structure and master plan contained in **Attachment 4** and **5**.

SLD submit that this rezoning this site is a logical extension to the existing Lake Hawea settlement. The site is flat, low lying land with very limited productive potential. The land is not visible from Lake Hawea lake surface or the Hawea River and the only visibility from public roads is from the roads directly adjacent being Domain Road and Cemetery Roads.

The increase in residential density of development from Rural Residential to Settlement/Residential will not have inappropriate adverse effects on amenity and landscape values of the area.

The site can be adequately and efficiently serviced with reticulated water and wastewater. As per the provisions of Chapter 27 - Subdivision, infrastructure upgrades and servicing costs are borne by the developer at the stage of subdivision and development.

Upgrades to major servicing roads are occurring through recently consented developments. Access onto Cemetery Road has been designed and constructed with sufficient capacity to service 119 lots. The rezoning can be accommodated without adversely impacting on traffic safety or efficiency of the network.

Rezoning the site will provide for a more efficient use of the land and will contribute to housing affordability, relevant to Lake Hawea community and the wider District.

**Relief sought**

- 4.1 Planning Map 17 - Rezone the Domain Acres site (Lot 1 DP 304937) from Rural Residential to Settlement Zone or in the alternative, a Residential zone that provides for low-density residential subdivision and development. The extent of rezoning sought is shown on the structure and master plans contained in **Attachment 4** and **5**.
- 4.2 Planning Map 17 - If the Domain Acres site (Lot 1 DP 304937) is rezoned to Settlement / Residential Zone, then rezone the southern triangle open space, as shown on the structure and master plans contained in **Attachment 4** and **5**.

Structure Plan - Include a Structure Plan for the Domain Acres block (Lot 1 DP 304937) as part of Chapter 27 - Subdivision. A indicative structure plan is contained as **Attachment 4**.

Any consequential amendments to give effect to this submission.

**5.0 Settlement / Residential - Objectives, Policies and Rules**

SDL seek an additional objective and supporting policies to guide greenfield development at Lake Hawea settlement. This framework is sought to support subdivision and development in accordance with the indicative structure plan contained in **Attachment 4**.

SDL seek rezoning of the site from Rural Residential to Settlement zone. In the alternative, SDL seek a Residential zone that provides for low-density residential subdivision and development with a minimum lot size of 800m<sup>2</sup> and residential site density of 800m<sup>2</sup> / residential unit. SDL preference is for a Settlement Zone, as the objectives, policies and rules support a level of residential amenity and character consistent the environmental outcomes sought by SDL for Domain Acres.

This residential density is akin to the existing Lake Hawea township and provides for family living and space for children to play. A high-quality residential environment will be achieved through low-density development with 1 – 2 story buildings surrounded by open space, good connectivity to community open spaces and landscaped streetscapes.

Along Domain Road a 5m landscaping strip is proposed with lots to provide a green edge connecting to the open space at southern end of the development and to the Hawea Irrigation race.

The provisions sought are set out in full in the table contained in **Attachment 1**. In summary:

Subdivision rules:

- A minimum lot size of 800m<sup>2</sup> for Lake Hawea - Domain Acres;
- Include a Structure Plan for Lake Hawea - Domain Acres and provide for subdivision consistent with the structure plan (refer rule 27.7.1).

Land use rules:

- A minimum residential density of 800m<sup>2</sup> / residential unit’;
- Support the enabling provisions for residential flats.
- On Domain Road frontage – require provision of a 5m wide landscaping strip to be planted with native species.

SDL support standards, similar to the following Settlement zone rules for residential activities applying to Domain Acres Settlement / Residential zone, including:

- Maximum building coverage - 40%
- Maximum building height - 7m.
- Road boundaries - 4.5m minimum building setback .
- Internal boundaries - 2m minimum building setback (with accessory building and eve exemptions).
- Recession planes – as per rule 20.5.14.

**Relief Sought:**

- 5.1 Chapter 27 - Subdivision: Insert an 800m<sup>2</sup> minimum lot size in respect of Domain Acres block (Lot 1 DP 304937).
- 5.2 Chapter 20 - Settlement: Insert a residential density of 800m<sup>2</sup> / residential unit in respect of Domain Acres block (Lot 1 DP 304937).
- 5.3 Objective, policies and rules as set out in **Attachment 1**.
- 5.4 Any consequential amendments to give effect to this submission.

**6.0 Section 32**

The Councils section 32 reports include a Landscape report prepared by Bridget Gilbert, titled “Hawea Urban Growth Boundary” (dated August 2019). The analysis in Section 5 – Capability to absorb urban development south of Cemetery Road and potential new UGB (existing situation). The report states:

*“a. the consented development in this area signals a fundamental change to the landscape character i.e. ‘the horse has already bolted’ southwards beyond Cemetery Road; and*

*b) such development (including the upzoning of the Streat Development land) could integrate defensible edges (which are currently lacking), consistent with urban design best practice.”*

SDL propose to augment the UGB and up-zoning with a landscape buffer. This will ensure it reads and functions as a legible and defensible urban edge, consistent with the recommendations of in the Landscape s32 report.

The Councils section 32 reports also include a capacity report prepared by ME consulting, titled 'Plan Enabled Capacity in Hawea and Albert Town (dated 14 August 2019). The report states:

*“Capacity is defined as the number of additional residential dwellings that could potentially be constructed under the planning provisions. It is a measure of plan-enabled capacity and does not take account of the commercial feasibility of construction or other non-planning factors that may affect the likelihood of construction.”*

SDL is concerned that the report does not contain a financial analysis of re-subdividing existing lots in the Lake Hawea township. It is observed most existing lots at Hawea township are 800m<sup>2</sup> and not able to be subdivide easily into 450m<sup>2</sup> lots - with an 800m<sup>2</sup> less say 100m<sup>2</sup> for a ROW is 700m<sup>2</sup>, which yields 2 lots at 350m<sup>2</sup>. SDL consider the existing housing stock has too high an improvement value for a good uptake for further subdivision, and figures in the Capacity report are unrealistically high. If there is insufficient capacity within the existing Township, SLD consider that greenfield land, such as Domain Acres, should be “up-zoned” to meet the communities housing needs.

## **6.0 Consequential Amendments**

### ***Relief Sought:***

SLD seek any consequential amendments to give effect to this submission.

### **Attachments:**

1. Table of Relief sought
2. Record of Title and Rural Residential 36 Lot Plan of Subdivision
3. Urban Growth Boundary Map (Patch)
5. Domain Acres Structure Plan (Patch)
5. Indicative Master Plan (Patch)