

**UNDER** the Resource Management Act  
1991

**AND**

**IN THE MATTER** of the **TE PUTAHI LADIES  
MILE PROPOSED VARIATION**  
to the **QUEENSTOWN LAKES  
DISTRICT PLAN**

**AND**

**IN THE MATTER** of a submission by **WINTER  
MILES AIRSTREAM LIMITED**  
pursuant to Clause 6 of  
Schedule 1 of the Act

**SUBMISSION BY WINTER MILES AIRSTREAM LIMITED ON A PROPOSED  
VARIATION TO QUEENSTOWN LAKES PROPOSED DISTRICT PLAN – TE  
PŪTAHI LADIES MILE**

**TO: QUEENSTOWN LAKES DISTRICT COUNCIL**

**NAME OF SUBMITTER: WINTER MILES AIRSTREAM LIMITED**

**1. INTRODUCTION**

1.1 Winter Miles Airstream Limited (“WMAL” or “Submitter”) makes this submission on the proposed variation to the Queenstown Lakes Proposed District Plan (“PDP”) to rezone areas of Rural, Rural Lifestyle, and Large Lot Residential land located in Te Pūtahi/Ladies Mile Corridor between Kimi-ākau/Shotover River and Te Whaka-ata a Haki-te-kura/Lake Hayes, i.e., the Ladies Mile Variation (“Variation” or “LMV”).

**Winter Miles Airstream Limited**

1.2 WMAL is a land development firm based in Queenstown which was founded in 2022 and undertakes a range of land subdivision and housing projects.

1.3 WMAL’s directors bring considerable experience to the Queenstown Lakes area (as well as greater Auckland), having worked on a wide range of projects - from land development and subdivision for medium-sized housing projects, to large, high density apartment developments. WMAL therefore has the ability to assist to address New Zealand’s (in particular, Queenstown’s) housing shortage by creating effective land development, best utilising the sites in an efficient and affordable way have helped to deliver hundreds of homes.

1.4 WMAL is the owner of a 3.3267 ha parcel of land (“Site”) (Lot 2 DP 359142) that is currently zoned Rural Lifestyle in the PDP and is located within the area

that is subject to the LMV. The Site contains a residential dwelling, a number of ancillary buildings and a helipad.

- 1.5 WMAL's interests as landowner are therefore directly affected by the potential effects of the subject matter of the LMV, to the extent that the LMV will be determinative of the development potential of the Site.
- 1.6 As regards the LMZ, WMAL has engaged architects to carry out bulk and location exercises and preliminary designs to determine the suitability of the proposed rules. The exercise was made immensely more challenging by the lack of consistency with the Tier 1 council rules most designers are familiar with and density requirements that are not seen anywhere else in New Zealand. More consistency with the Tier 1 council rules and more flexibility to achieve a greater range of density will result in faster delivery and more affordable dwellings for the community.
- 1.7 WMAL could not gain an advantage in trade competition through this submission.

#### **WMAL submission - overview**

- 1.8 WMAL's submission relates to the LMV in its entirety (particularly insofar as consequential amendments may be required to address the specific issues).
- 1.9 WMAL supports the LMV in part in part and opposes the LMV in part.
- 1.10 For the most part, and at a high level, WMAL supports the LMV as representing a sound measure that is deserving of support for the reasons outlined below. However, WMAL is concerned that aspects of the LMV are overly restrictive / prescriptive and do not represent sound resource management principles and practice.

#### WMAL support for the LMV

- 1.11 WMAL supports the LMV and the rezoning of its land within the High Density Residential precinct:
  - (a) Insofar as the urban rezoning of land along the northern side of Ladies Mile will enable a higher density of residential yield on WMAL's site and surrounding properties.
  - (b) Subject to refinements as further detailed in this submission and those that arise from consequential relief to implement the matters of "particular concern" outlined below.
- 1.12 To the extent that WMAL supports the LMV, it is endorsed, overall, as a measure that promotes the sustainable management purpose of the the Resource Management Act 1991 ("RMA"), particularly insofar as it will enable the use of the LMV land to be managed and developed in a manner that will enable people to provide for their social and economic wellbeing and for their health and safety while appropriately addressing potential adverse effects.

#### WMAL opposition to the LMV

- 1.13 WMAL opposes the LMV to the extent that:
  - (a) It contains a number of significant shortcomings that would adversely impact on the implementation of the zoning (and the potential benefits that would arise from implementation); and

- (b) Create issues around the mechanics of the Plan framework that have the potential to hinder rather than enable appropriate development.

1.14 In that regard, WMAL is concerned that aspects of the LMV:

- (a) Are overly restrictive / prescriptive.
- (b) Will not result in the outcomes anticipated for the Zone;
- (c) Would create uncertainty and difficulties associated with monitoring and enforcement.
- (d) Would not represent the most effective and efficient way of achieving the objectives of the LMV; and
- (e) On that basis, do not represent sound resource management principles and practice.

1.15 The grounds for WMAL's opposition are addressed throughout the remainder of this submission.

**Relief sought**

1.16 The relief sought by WMAL is set out in the table attached as Appendix A.

**2. WMAL SUBMISSION – SPECIFIC SUBMISSION POINTS AND RELIEF SOUGHT**

2.1 As noted, WMAL's submission relates to the LMV as a whole and seeks relief that is sufficiently broad to address the shortcomings that WMAL perceives to arise.

2.2 The specific matters to which the submission relates are as follows:

- (a) Provisions – General;
- (b) Trigger points;
- (c) Bulk, location, and density;
- (d) Housing affordability;
- (e) Structure plan;
- (f) Residential visitor accommodation;
- (g) Traffic and parking;
- (h) Residential flats;
- (i) Commercial activity; and
- (j) Notification provisions.

2.3 The following sections of this submission set out WMAL's specific submission points in relation to the above matters, including the grounds for WMAL's submission and relief sought.

### 3. PROVISIONS – GENERAL

- 3.1 WMAL is concerned that the information required to be supplied with resource consent applications is excessive and unhelpful in failing to provide a clear planning framework.
- 3.2 For example, Rule 49.4.4 relating to residential units in the medium and high-density precincts sets out matters of discretion that are so extensive that the activity status becomes effectively fully discretionary. It is also unduly restrictive on imposing a consent regime for two or more residential units whereby, given the intent of the zone, there should be a permitted activity regime enabling the development of a higher number of units on any given site.
- 3.3 Another example, the requirement in Rule 49.5.19 imposes a landscaping requirement on a "per site" basis where a site is located above ground level with the upshot that the outcome cannot be achieved and a development defaults to non-complying activity status.

#### Relief sought

- 3.4 WMAL seeks the relief set out in Appendix A.

### 4. TRIGGER POINTS

- 4.1 The LMV contains provisions that provide for triggers that need to be met before development can occur / implementing the LMV zoning. WMAL is concerned that there is insufficient certainty of those triggers being achieved in a timely manner alongside the support of the Council and other agencies.
- 4.2 The trigger points relating to transportation infrastructure that must be first implemented before the zoning can be implemented requires further clarity in regard to the wording/terminology used, as well as refinement on those matters that are fundamental to preventing the zoning from being given effect to (as compared with those that are 'nice to have's'). A particular concern in that regard relates to the provision of transport infrastructure:
- (a) Rule 49.5.33 – staging development to integrate with transport infrastructure.
  - (b) Policy 27.3.24.6 – which seeks to "avoid" future and cumulative adverse effects from additional traffic movements on State Highway 6.
  - (c) Rule 27.7.28.1(h) – restricted discretionary activity assessment criteria relevant to provision of transport infrastructure.
- 4.3 Of particular concern is Rule 49.5.33, which provides that private development within the TMV Sub-Areas (i.e., excluding utilities and other physical infrastructure) shown on the Structure Plan cannot occur prior to all the corresponding transport infrastructural works listed in the rule being completed. Rule 49.5.33 states that:
- "Development (except for utilities and other physical infrastructure) within the Te Pūtahi Ladies Mile Sub-Areas shown on the Structure Plan shall not occur prior to all the corresponding transport infrastructural works listed below being completed."*
- 4.4 On the plain wording of the rule, completion of all of the works listed for Sub-Areas A - G is required before any development in those sub areas can commence. Most of these measures are unrelated to WMAL's site, such that

delaying development of WMAL's site pending the other works identified in the rule is completely unjustified from a planning perspective, particularly given that not all "development" generates demands on traffic and infrastructure.

- 4.5 It is not clear if that was intended. If so, it does not represent sound planning principle and practice and needs to be rectified.

**Relief sought**

- 4.6 WMAL seeks the relief set out in Appendix A.

**5. BULK, LOCATION & DENSITY**

- 5.1 WMAL is concerned that the provisions of the LMV encourage or direct development that is not financially feasible or attractive to end users (whether they be renters or future landowners), resulting in an outcome in which the development of Ladies Mile is hindered rather than enabled.

**Relief sought**

- 5.2 WMAL seeks the relief set out in Appendix A.

**6. HOUSING AFFORDABILITY**

- 6.1 'Housing affordability' is referred to throughout the provisions of the LMV, often without direction as to how that is to be achieved. WMAL is concerned that some of the plan provisions by the LMV may, to the contrary, increase unaffordability.

**Relief sought**

- 6.2 WMAL seeks the relief set out in Appendix A.

**7. STRUCTURE PLAN**

- 7.1 WMAL is concerned to ensure that the requirement to undertake development that is in "general accordance" with the structure plan may be unduly restrictive and requests that further flexibility be provided.

**Relief sought**

- 7.2 WMAL seeks the relief set out in Appendix A.

**8. RESIDENTIAL VISITOR ACCOMMODATION**

- 8.1 WMAL's position is that "residential visitor accommodation" (as defined in the PDP) does not represent, in and of itself, an activity that generates such adverse effects that it should be afforded non-complying activity status.

**Relief sought**

- 8.2 WMAL seeks the relief set out in Appendix A.

**9. TRAFFIC AND PARKING**

- 9.1 WMAL is concerned that the provisions of the LMV relating to traffic (including apparent discouragement of private vehicle ownership) are unduly restrictive, onerous and contrary to sound resource management planning.

### **Relief sought**

- 9.2 WMAL seeks the relief set out in Appendix A.

## **10. RESIDENTIAL FLATS**

- 10.1 WMAL is concerned to ensure that residential flats are not unreasonably precluded by the provisions of the LMV and are recognised as an ancillary residential use that would support the shortage of accommodation in the Whakatipu area. The provision most relevant in that regard comprises Rule 49.4.7.

### **Relief sought**

- 10.2 WMAL seeks the relief set out in Appendix A.

## **11. COMMERCIAL ACTIVITY**

- 11.1 WMAL's position is that the LMV should support the establishment of a primary commercial precinct while refining the location of smaller scale commercial zoning across the Structure Plan to ensure that sufficient provision is made in response to the demand to be established from urban rezoning, including the allowance of 5,000m<sup>2</sup> of commercial precinct on the submitters land;

### **Relief sought**

- 11.2 WMAL seeks the relief set out in Appendix A.

## **12. NOTIFICATION ISSUES**

- 12.1 The LMV should contain clear direction and certainty in the provisions by requiring development in the HDR precinct to be advanced without affected persons approval and without notification.

### **Relief sought**

- 12.2 WMAL seeks the relief set out in Appendix A.

## **13. RELIEF SOUGHT BY WMAL AND RELATED ISSUES**

- 13.1 WMAL seeks as relief:
- (a) That the land encompassing the LMV is rezoned to urban zoning enabling high density urban development with 5,000m<sup>2</sup> of its land located in the commercial precinct.
  - (b) Amendments to the LMV that address the concerns addressed above, including but not limited to amendments to the objectives, policies, rules and Structure contained in Appendix A (**attached**).
  - (c) Such further or other amendments, including consequential amendments, as may be necessary to address the issues raised by WMAL.
- 13.2 The submitter wishes to be heard at any hearing of the Variation in support of its submission.

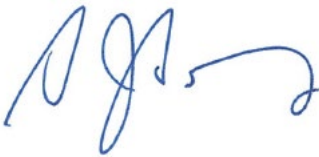
13.3 If others make similar submissions, the Submitter would not consider presenting a joint case at any hearing.

**DATED** 9 June 2023

**WINTER MILES AIRSTREAM LIMITED**

by its solicitors and duly authorised agents

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**APPENDIX A**

**TABLE SHOWING RELIEF SOUGHT BY WINTER MILES AIRSTREAM LIMITED**



## Appendix A – Amendments Requested

Section of Plan	Proposed Provision	Support/Oppose	Reason for Submission	Relief Sought
49.1	Zone Purpose	Support with amendments	<p>The Submitter generally supports the purpose of the Zone.</p> <p>The zone statement relating to the High Density Residential precinct is overly directive towards multi-unit development and the submitter considers this should be broadened to allow for a range of typologies, including standalone residential units.</p> <p>As set out in the submission, it is requested that further smaller pockets of commercial zoning are provided for within the Masterplan. To this effect, the Commercial Precinct should not be standalone and the purpose statement amended to clarify that pockets of commercial zoning are integral to efficiently provide for ease of access, distribution and functionality of appropriate commercial activity.</p> <p>The submitter also requests that the minimum density is amended to 40 units per hectare for the reasons set out in its submission.</p>	<p>Amend the zone purpose:</p> <p>“...  <ul style="list-style-type: none"> <li>The High Density Residential Precinct provides for <u>high density residential</u> <del>multi-unit</del> accommodation, to a density of at least <del>40</del> <del>60</del> units per hectare, in locations close to areas of public open space, future transportation links, and facilities;</li> <li>The <u>primary</u> Commercial Precinct is centrally located within the Zone and provides a focal point for commercial activities and amenities to serve the resident community while <u>providing for smaller pockets of commercial activity</u>, while ultimately not undermining the role of the commercial areas at Frankton or the Queenstown Town Centre;</li> </ul>           ...”</p>
Objectives and Policies 49.2	Policy 49.2.1.1	Support with amendments	Where the provisions refer to the implementation of the structure plan, the submitter considers that there needs to be some ‘room to move’ around that with the wording amended from “consistent with” to “in general accordance with”. This will allow for better outcomes. This wording is requested throughout the provisions.	<p>Amend the policy:</p> <p>“Require that development is <u>in general accordance</u> <del>consistent</del> with the Structure Plan to ensure the integrated, efficient and co-ordinated location of activities, primary roading, key intersections, open spaces, green networks, and walkway / cycleway routes.”</p>
	Objective 49.2.2	Support with amendments	Where “affordability” is referred to in the policy, the submitter considers it needs to be clear what mechanism is expected to achieve this. If this is not clear, references to affordability should be removed.	Consider amending objective.
	Policy 49.2.2.1	Oppose	Ensure that the Submitter’s site and the zone is not unreasonably restricted in terms of the density limits. The concern is that the plan framework directing a ‘firm’ minimum density of 60-72 units per hectare is unrealistic and will lead to poor design outcomes. Reducing this density to a minimum of 40 units per hectare in addition to removing the exclusions in Rule 49.5.16 for “gross developable area” will better enable a design and market led response to development while not precluding higher densities in certain circumstances where all viability can be achieved.	<p>Amending policy:</p> <p>“Within the Medium and High Density Residential Precincts:            a. Promote affordability and diversity of housing by maximising choice for residents through encouraging a range of residential typologies, unit sizes and bedroom numbers.            b. Avoiding development that does not achieve the residential densities required in each Precinct, and <u>managing</u> <del>avoiding</del> <u>lower</u> density housing typologies including single detached residential units.”</p>
	Policy 49.2.2.2	Oppose	The submitter considers that the High Density Residential Precinct should allow for a variety of housing typologies that does not preclude stand alone homes.	<p>Amend policy:</p> <p>“Within the High Density Residential Precinct, require a high density of residential units that are well designed for <u>a range of housing typologies</u>, including terraced housing, multi-storey townhouses and apartment living typologies, set within attractive landscaped sites, along with key parks and open spaces, and public transport routes.”</p>
	Objective 49.2.3		While the establishment of a primary commercial zone is supported, provision should be made for small areas of Commercial precinct to be established to	Amend the objective as follows:

			ensure that access is efficient to cater for the demands arising from the intensified development.	"The Commercial Precincts <del>are</del> is compact, convenient and accessible for meeting the needs of local residents".
	Objective 49.2.5	Support	The supports a range of compatible activities to be provided for within the Zone.	Retain.
	Policy 49.2.5.2	Support with amendments	Up to 100m2 of commercial activity is provided for per site in the HRDR precinct. Commercial activity is defined and includes a broad range of activities. It is unreasonable to expect all effects on residential amenity from commercial activities will be avoided and it is requested that this policy is amended.	Amend policy: "Limit commercial activities in the residential precincts to a scale that maintains the primacy of the Commercial Precinct for these activities, supports the social and economic well-being of the local community, and avoids <u>or mitigates</u> adverse effects on residential amenity.
	Policy 49.2.5.4	Oppose	This policy is too broad within what is a very prescriptive planning regime. There is no need for a negative catch-all policy that would create planning hurdles for new and innovative activities and the submitters considers this policy should be deleted.	Delete policy.
	Policy 49.2.5.5	Oppose	It is unreasonable to avoid residential visitor accommodation, and more appropriate that those effects are managed.	Amend: Avoid Visitor Accommodation and <u>manage the effects of</u> Residential Visitor Accommodation, consistent with the role of the Zone in providing for the needs of local residents.
	Objective 49.2.6	Oppose	This objective is too directive against the aspiration desires to minimise traffic generation and the broad reference to "development" could be misconstrued to capture all forms of land use, including those that have no adverse impact on SH6.	Amend: <u>Traffic generating activity</u> <del>Development</del> in the Zone minimises the generation of <u>additional significant</u> vehicle trips along State Highway 6, and reduces, <del>as far where as</del> <u>as far where as</u> practicable, vehicle trips along State Highway 6 generated by the adjoining residential areas at Ladies Mile.
	Policy 49.2.6.2	Oppose	The directions in this policy relate to matters outside of landowners control (i.e. being the trigger points to enable the zoning) and the policy should be amended to reflect this.	Amend: "Enable <del>Require</del> the integration of the Zone with the adjoining residential areas at Ladies Mile and State Highway 6 by: a. Strategically locating intersections at key points on State Highway 6 and Lower Shotover Road; b. <u>Locating</u> <del>Requiring</del> multiple pedestrian and cycle crossings of State Highway 6, Lower Shotover Road and Howards Drive at locations that support integration with public transport within walking distance of residential areas; and c. Providing for new road connections that enable access to bus services."
	Policy 49.2.6.3	Oppose	Again, the directions in this policy relate to matters outside of landowners control (i.e. being the trigger points to enable the zoning) and the policy should be amended to reflect this.	Amend: "Enable <del>Provide for</del> efficient and effective public transport through: a. Requiring higher residential densities within the Zone north of State Highway 6; b. Ensuring road widths and configurations are consistent with their efficient utilisation as bus routes; c. Discouraging private vehicle <del>ownership and</del> use by limiting onsite carparking via maximum rates for residential, office, retail and education activities <u>commensurate to the timing of the demands generated by those activities</u> ;

				<p>d. Limiting on-street parking; and e. Requiring transport infrastructural works related to public transportation to be in place prior to development.</p> <p>e. Requiring transport infrastructural works relating to public transportation to be in place prior to development that generates significant traffic effects”.</p>
	Policy 49.2.6.4	Oppose	<p>It should be made clearer that providing a pedestrian underpass is not the only way of providing a crossing of the SH6 and providing a method that has not certainty of implementation is inappropriate.</p>	<p>Encourage the use of pedestrian and cycling modes by:</p> <p>a. Requiring high-quality, well connected, integrated and legible walking and cycling routes and linking to existing routes outside the Zone;</p> <p><del>b. Preferring the provision of an underpass for the Key Crossing indicated on the Structure Plan;</del></p> <p>c. Discouraging private vehicle ownership and use by limiting onsite carparking via maximum rates for residential office and retail activities <u>commensurate to the timing of the demands generated by those activities</u>;</p> <p>d. Requiring minimum cycle parking to be provided onsite for commercial, educational and residential activities; and</p> <p>e. Enhancing active travel experiences by requiring adjacent development to integrate with the Key Crossing shown on the Structure Plan and by providing high-quality recreation spaces along routes.</p>
	Policy 49.2.6.5	Oppose	<p>This policy is too directive and written in a way that will mean it is unlikely to be achieved.</p> <p>It is entirely reasonable that some development be enabled without having to commit to transport upgrades and the policy should be clearer around this.</p>	<p>Amend:</p> <p><del>Avoid</del> <u>Manage</u> development where specific transport infrastructural works have not been completed, unless <del>the # it can be demonstrated that development will avoid future and cumulative</del> adverse effects from additional traffic movements, particularly at weekday daily peak periods, on State Highway 6, <u>can be accommodated</u>.</p>
All Precincts north of State Highway 6	Policy 49.2.7.9	Support with amendments	<p>The submitter considers that there needs to be flexibility in the policy to enable appropriate outcomes given that the provisions to not include methods to ensure that such outcomes are achieved.</p>	<p>Amend:</p> <p><del>Enable</del> <u>Require</u> high quality building and site design that promotes and supports neighbourhood amenity values, reflects the highly visible location close to the state highway, and that is appropriate in the setting adjacent to the outstanding natural feature of Slope Hill.”</p>
	Policy 49.2.7.10	Support with amendments	<p>The submitter considers that there needs to be flexibility in the policy to enable appropriate outcomes given that the provisions to not include methods to ensure that such outcomes are achieved.</p>	<p>Amend:</p> <p>“In the Medium and High Density Residential Precincts and the Commercial Precincts, require that development responds to its context, with a particular emphasis on the following essential built form outcomes:</p> <p>a. achieving <del>high levels of</del> visual interest and avoiding blank or unarticulated walls or facades;</p> <p>b. achieving well-overlooked, activated streets and public open spaces, including by not dominating street edges with garaging, parking or access ways;</p> <p>c. achieving a variation and modulation in building mass, facades, materials and roof forms, <u>where appropriate</u>;</p> <p>d. using well-designed landscaped areas to add to the visual amenity values of the development for residents or visitors, neighbours, and the wider public.”</p>

Medium and High Density Residential Precincts	Policy 49.2.7.11		The submitter considers that there needs to be flexibility in the policy to enable appropriate outcomes given that the provisions to not include methods to ensure that such outcomes are achieved.	Amend:  Apply recession plane, building height, yard setback and site coverage controls as the primary means <u>to manage</u> of <del>ensuring a minimum level of</del> outlook, sunshine and light access, while <u>enabling</u> <del>acknowledging that</del> through an application for land use consent an outcome <u>more appropriate</u> <del>superior</del> to that likely to result from strict compliance with the controls <u>may arise</u> <del>may well be identified</del> .
49.4 Rules - Standards	Rule 49.4.4	Oppose	The matters of discretion effectively make the activity full discretionary, which will lead to a costly and uncertain consenting process. Consideration should be given to making the activity status controlled to provide certainty to the consenting process.  Amend the rule such that the trigger is 5 or more residential units per site, providing for a more efficient pathway to implementation of the zoning and desired densities.	Amend rule to state " <del>Two</del> <u>Five</u> or more residential units..." and change activity status to controlled.
	Rule 49.4.5 – Residential Visitor Accommodation	Oppose	Recognising that "residential visitor accommodation" (as defined in the PDP) is not in and of itself an activity with an effect that should be afforded non-complying activity status and can have positive effects in allowing for a landowner to maintain an income stream for visitor use (often needed for first home buyers for securing a mortgage) while maintaining residential activity as the primary activity.	Delete rule.
	Rule 49.4.7 – Residential Flats	Oppose	Removing the direction towards the mandatory development of terrace housing and multi-story housing as a means to achieve density and provide within the provisions the flexibility for a full range of housing typologies, including single level family homes.	Delete rule.
	Rule 49.4.8 - Commercial Activities comprising no more than 100m <sup>2</sup> of gross floor area per site in the High-Density Residential Precinct	Support	Residential flats should be permitted within the HDR precinct given they provide another form of accommodation that is ancillary to a principal residential use on a site.  There is no policy support for non-complying status, rather changing the status to permitted would best achieve the proposed objectives and policies.	Retain.
	Rule 49.4.22	Oppose	The proposed provisions are a highly prescriptive planning regime and there should be certainty in the range of activities identified in the provisions have been covered such that any "other activities" can be guided by the policy framework and be afforded discretionary status.	Amend activity status of "catch all rule" from non-complying to discretionary.
	Rule 49.4.35	Oppose	The Site has a consented helipad that is in use and will continue to be used. This needs to	
	Rule 49.5.15	Support with amendments	Development should be in "general accordance" with the structure plan, as previously set out.  Furthermore, shortcomings arising from the location of roading within the masterplan area, particularly Collector Type A which is shown on the structure plan in a different location to the legal road that dissects sub areas D, E, F and G. The provisions should zone this legal road (currently it is shown as un-zoned) and provide for a land swap mechanism within the provisions to enable the land encompassing the legal road to be swapped with the land encompassing Collector Type A, ultimately facilitating development of the land.	Amend rule:  "Development shall be <del>consistent</del> <u>in general accordance</u> with the structure plan ..."
	Rule 49.5.16	Oppose	Ensure that the Submitter's site and the zone is not unreasonably restricted in terms of the density limits. The concern is that the plan framework directing a	Amend rule.

			'firm' minimum density of 60-72 units per hectare is unrealistic and will lead to poor design outcomes. Reducing this density to a minimum of 40 units per hectare in addition to removing the exclusions in Rule 49.5.16 for "gross developable area" will better enable a design and market led response to development while not precluding higher densities in certain circumstances where all viability can be achieved.	
	Rule 49.5.18		The proposed recession plane controls are not workable for development.	Amend rule to reflect recession plane requirements for Tier 1 under the NPS-UD.
	Rule 49.5.19	Support with amendments	Rule 49.5.19.2 Ensure future consenting processes are cost effective and efficient, through minimising the information requirements and providing a clear planning framework.	Amend by removing the landscaping requirement on a "per site" basis where a site is located above ground level meaning the outcome cannot be achieved and a development defaults to non complying status.
	Rule 49.5.21 -Building Coverage	Support with amendment of activity status	In regard to Rule 49.5.21.2 Changing a breach to the maximum building coverage of 70% from non-complying to restricted discretionary to better enable the use of the land resource to achieve the outcomes sought by the plan change.	Amend to be a Restricted Discretionary status
	Rule 49.5.33	Support with amendments	The triggers in Rule 49.5.33 prevent any "development" from occurring before certain matters are achieved but this overlooks that not all "development" generates demands on traffic and infrastructure.	Amend: Rule includes non-critical triggers that should be removed from the rule, namely the bus stops on SH6 (west of Howards Drive intersection) on either side of the SH6, and the pedestrian/cycle crossing on SH6.
49.6 – Rules – Non notification of applications	49.6	Oppose	To enable the outcomes directed in the objectives and policies of the zone, the submitter considers that development compliant with the standards in the High Density Residential precinct should be afforded the certainty of non complying activity status without the need To obtain approval from affected persons.	Amend rule to reflect a non notified consenting process.
49.8 Structure Plan	Te Pūtahi Ladies Mile Zoning Plan	Support with amendments	Support with amendments to reflect the issue raised in the submission.	Amend
27.10 – Rules- Non Notification of Applications	27.10	Support	To enable the outcomes directed in the objectives and policies of the zone, the submitter considers that development compliant with the standards in the High Density Residential precinct should be afforded the certainty of non complying activity status without the need To obtain approval from affected persons.	Amend