

QLDC Council
17 December 2015

Report for Agenda Item: 4

Department: Planning & Development

**Special Housing Area Proposal – Business Mixed Use Zone (Gorge Road):
Assessment and Recommendation**

Purpose

The purpose of this report is to assess a Council initiated proposal for a Special Housing Area (**SHA**) over multiple privately owned properties within the proposed Business Mixed Use Zone (Gorge Road, Queenstown) for consideration for recommendation to the Minister for Building and Housing (**Minister**).

Executive Summary

1. The Council has already met the year 1 Housing Accord target (350 sections/dwellings consented) with more than 500 building and resource consents granted. None of these consents were directly from SHAs, however, and the year 2 (450) and year 3 (500) targets are higher.
2. The Bridesdale SHA is the only proposed SHA to have been conferred SHA status. At its November meeting, Council recommended that three further potential SHAs – Arthurs Point, Onslow Road, Shotover Country - be forwarded to the Minister, subject to the execution of deeds. Together these four SHAs enable the potential for around 350 dwellings, noting there is no guarantee that applications will be made, or granted, once SHA status is conferred. A further potential SHA, for a retirement village proposal near Arrowtown, received support in principle from Council, and is now being further investigated. If it proceeds it could result in a further 150 dwellings.
3. There is a risk that the District's acute housing supply and affordability issues will continue to grow and available capacity will not keep up with demand or meet the Housing Accord targets.
4. The District Plan Review found that there is little acknowledgement that the operative Business Zone along Gorge Road is strategically located close to Queenstown town centre, with the potential to absorb taller and more intensive development, including apartment-style living.
5. A SHA for the proposed Business Mixed Use Zone (**BMU Zone**) is aligned with the Proposed District Plan (**PDP**) – enabling potential apartment development up to 20m (6 storeys) but with controls in place ensuring that amenities, such as sunlight access and privacy for existing residents, are protected. A 20m limit is considered appropriate given that most of the properties in the BMU zone are commercial or separated well from residential properties.

6. 28 submissions on the BMU zone of the Proposed District Plan were received. Only five were explicitly in opposition, with the balance either supportive or not explicitly supportive or oppositional.
7. The proposal will potentially bring forward the supply of apartments close to the town centre that will help meet the Housing Accord targets.

Recommendation

That Council:

- a) **Note** the assessment of the proposed SHA for the BMU Zone against Council's Lead Policy on SHAs, and the relevant provisions of the Housing Accords and Special Housing Areas Act (**HASHAA**) and local planning context under the Resource Management Act, in considering any recommendation to the Minister.
- b) **Resolve** to not seek feedback on the proposed SHA for the BMU Zone, relying instead on the statutory consultation undertaken as part of the PDP process.
- c) **Recommend** the proposed SHA for the BMU Zone to the Minister, subject to the following criteria for qualifying developments:
 - Building height limit of 20 metres.
 - At least 30% of dwellings shall comprise gross floor areas no greater than 40 square metres

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4/12/2015

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Background

8. The Council entered into a Housing Accord with the Minister in 2014. Under that Accord, Council has committed to achieving housing targets over the three year life of the Accord. Part of the means of achieving the targets is through SHAs.
9. In October 2014, Council adopted a Lead Policy to guide its assessments of potential SHAs and to provide general parameters around its approach. The

Lead Policy was amended by Council at its meeting in April 2015 to include consideration of Community Housing and to prevent the development of land in SHAs being used as short term rental / visitor accommodation.

10. Council invited Expressions of Interest (**EOI**) for potential SHAs in late 2014. 16 EOIs were received, and three were subsequently withdrawn. The Bridesdale SHA is the only proposal approved by the Minister. The owner of the Bridesdale land has applied for resource consent under HASHAA for a qualifying development, which has been heard by commissioners. A decision is anticipated in December.
11. At the 26 November 2015 meeting, Council recommended three proposed SHAs to the Minister. These are subject to execution of deeds.
12. At the same Council meeting, Council supported in principle a proposed SHA for a retirement village near Arrowtown. The next step is for a draft deed to be developed, addressing a range of matters under Council's Lead Policy on SHAs, including infrastructure, community housing and design matters. The proposal will need to be considered by the Council again before a final decision is made as to whether it should be recommended to the Minister.
13. The Housing Accord Year 1 target has been met, with over 500 resource or building consents granted within the first year of the Accord, exceeding the required target of 350. None of these consents were from SHAs.
14. This reflects a very buoyant residential development market. However the buoyancy of that market cannot be taken for granted, and targets in the Housing Accord increase in Years 2 and 3. Therefore, to fulfil obligations under the Housing Accord, additional SHAs are considered necessary and consistent with the Accord. This report proposes a Council-initiated SHA that covers multiple properties for the BMU Zone included in the PDP, to assist with meeting the targets.

Comment

15. This report identifies and assesses the following reasonably practicable options for assessing the matter as required by section 77 of the Local Government Act 2002.
16. Option 1: Do not recommend the proposed BMU Zone to the Minister of Building and Housing for establishment as a SHA.

Advantages:

17. Ensures that development within the currently operative Business Zone is subject to the PDP process, including statutory consultation, hearing process and potentially Court appeals.
18. Ensures that any applications for housing in the operative Business Zone are subject to the current rules (before the PDP is operative), with usual RMA consultation and notification requirements.

Disadvantages:

19. Risk that the District's acute housing supply and affordability issues will continue to grow, with resulting social and economic impacts.
20. The PDP provisions for residential development within the proposed BMU Zone might not be operative for several years.
21. 'Underdevelopment' might occur in the interim given lack of certainty around the Proposed BMU Zone provisions, with the opportunity for future higher intensity development (and housing yield) so close to town compromised
22. Housing Accord targets might not be met.
23. Option 2: Recommend the SHA for the proposed BMU Zone.

Advantages:

24. Qualifying developments should largely align with PDP.
25. The PDP provisions for development in the proposed zone are already in the public realm and the community has had an opportunity to lodge submissions. The majority of submissions are supportive or supportive in part. However it is acknowledged that bringing forward development rights consistent with the PDP provisions through the SHA process conflicts with those parties who have opposed the proposed provisions, or are supportive but have requested amendments.
26. SHA status will enable significant development rights over and above the Operative District Plan provisions, and a streamlined and lower risk planning process. This should incentivise landowners to develop properties for higher density housing.
27. For the most part, properties located in the Proposed BMU zone are located well away from residential properties. For the few properties that are located adjacent to, or close to residential properties, height and shading controls in the PDP should provide reasonable protection of amenity values. As a result, the proposed SHA has potential to realise significant housing yield but with limited impacts.

Disadvantages:

28. Development might progress in the SHA in a manner that is consistent with the PDP, however the proposed provisions might change through the hearings and decision making process, potentially resulting in misalignment with the ultimate operative plan provisions.
29. This report recommends **Option 2**.

Interrelationship with the District Plan Review

30. Establishing SHAs is essentially the first of two legislative steps required in terms of realising development. Once SHAs are established, resource consent applications for “qualifying developments” may be made to the Council. Establishment of SHAs is enabling but does not guarantee an increase in housing being released to the market. This process relies on private developers coming forward with development proposals and applications.
31. When resource consent applications for qualifying developments are assessed, RMA, ODP and PDP matters must be considered. The PDP is third in the hierarchy of matters that can be considered under HASHAA. The fact that the Council is currently carrying out a PDP process is relevant to decision-making under HASHAA.
32. The District Plan Review analysis found that there is little acknowledgement that the existing zone is strategically located close to Queenstown town centre, or that there could be opportunities for apartment-style living close to town. The zone has the potential to absorb taller and more intensive development.
33. The PDP converts the operative Business Zone to a proposed BMU Zone. The zone enables a mix of commercial and residential activities that will increase the diversity of housing supply in the District by providing more opportunities for high density housing very close to town – close to employment, services and amenities.
34. Applications for resource consent for qualifying developments would be required to address PDP building height controls and design standards for bulk and location to avoid possible adverse effects on existing residential properties in neighbouring zones (such as shading or loss of privacy), and to promote good design outcomes. These design expectations would be reinforced by the design expectations set out in Council’s Lead Policy on SHAs, and also noting that Section 34(1)(e) of HASHAA requires applications to be assessed against the Ministry for the Environment’s Urban Design Protocol.
35. It is also worth noting how the development rights enabled through a potential SHA compare to those potentially enabled through the District Plan Review. If the Council recommended the BMU area to the Minister, and the Minister conferred SHA status in April, then applications could be lodged for development proposals from that time. Whilst any assessment of an application under HASHAA would need to give primary consideration to the purpose of the HASHAA legislation, a strong consideration would be the provisions of the Proposed District Plan. The Operative District Plan would have limited weight, and therefore good quality proposals consistent with the Proposed Plan would have a strong chance of attaining approval.
36. In comparison, the rules in the Proposed District Plan have no legal effect until decisions on submissions have been notified. This is unlikely to be until August 2016. If there are no appeals on the proposed BMU provisions, then those provisions are operative. Therefore the proposed BMU provisions could

potentially be operative as early as September, noting the final form of those provisions is not certain given the hearings process that must occur in 2016.

37. If the proposed BMU provisions are appealed, then there will be a period of time where the proposed provisions have legal effect and must be weighed against the operative provisions. This period could potentially extend well into 2017 or even 2018, so under this scenario there is a degree of development uncertainty which may potentially deter applications for development proposals.
38. Given the uncertainty of these processes, and the pronounced nature of the housing issues in the Wakatipu Basin, there is considered to be significant benefit in advancing the SHA.

Analysis against Lead Policy Criteria

39. The Lead Policy adopted by Council in October 2014 and subsequently amended in April 2015, forms the basis of this assessment.

Location

40. The proposed BMU Zone is located in the Gorge Road area, within easy walking distance of the main commercial centre of Queenstown, and very close to existing services and shops on Gorge Road itself.
41. The Lead Policy specifies that SHAs in existing urban areas will be viewed more favourably from a 'location' perspective. The zone is within the existing urban area of Queenstown and as such is ideally located for SHA purposes, especially given its proximity to the town centre.

Adequate Infrastructure

42. Holmes Consulting Group have undertaken a high level assessment of infrastructure capacity in the proposed SHA area. This assessment is contained in Attachment A.
43. Holmes conclude:
The Gorge Road Business Mixed Use area can be designated as an SHA without requiring significant new upgrades (other than those already proposed for the wastewater network) to the Three Waters network.

Housing demand

44. It is well known both analytically and anecdotally that housing, particularly at the more affordable end of the market, is in high demand throughout the Wakatipu Basin. The availability of rental stock and new homes is currently very low. Each of Shotover Country's section releases have sold rapidly and the Bowen St residential development (located close to Gorge Road) recently sold out in 2 days. It is expected that housing in the proposed BMU Zone

would be highly sought after, particularly for much-needed worker accommodation.

Visitor Accommodation

45. The Lead Policy was amended to seek to prevent short term rentals or visitor accommodation within SHAs. When considering individual sites for SHA status, Council can enter into deeds which prevent the use of dwellings for visitor accommodation purposes. However the Proposed BMU SHA covers a large number of properties, so this is not possible.
46. However, Council can impose conditions of resource consent to prevent short term rentals or visitor accommodation. This would ensure that the proposed SHA would provide either permanent rental or owner occupied housing, although some dwellings may be used as holiday homes.
47. Under HASHHA qualifying developments must be predominantly residential, with a commercial mixed use component being ancillary to residential development. For example, a shop or cafe might be located on the ground floor of a building with a number of apartments situated above it.
48. As there is a legislative requirement for proposals to be 'predominantly residential', a visitor accommodation proposal could not be accepted by Council for processing under HASHAA. To provide certainty that any residential units proposed in an application are not used in the future for visitor accommodation, conditions can be imposed at the time of consent.

Housing Quality

49. The Council would expect building and site design to follow the guidance of the Urban Design Protocol and the PDP to ensure a good level of design quality which satisfied sound urban design principles. It would also be appropriate for mid to large scale proposals to be presented to the Urban Design Panel, as is common practice under the RMA process.

Affordability

50. The Lead Policy expects proposals to provide a proportion of smaller dwellings or sections. The proposed SHA would enable apartment living of varying sizes. It is anticipated that the change to the BMU Zone would enable the delivery of a number of smaller studio, 1 or 2 bedroom units to the housing market.
51. Multi-level construction is expensive, and even with high yield and small units will not necessarily result in strictly affordable housing. However, this should be offset by the fact that for many potential residents transport costs should be minimal in this location, and compact dwellings realised in an apartment building constructed to current Building Code requirements should reduce winter heating costs (which can be significant in the District). As a result, such development offers the potential for relatively affordable housing choice when

looking at household costs overall and an attractive housing option for people working in Queenstown.

52. The Council may wish to consider specifying affordability criteria for any qualifying development which, under HASHAA, may be by reference to median house prices, median household incomes, individual income, the median multiple (median house price divided by gross annual median household income), or any other matter relevant to affordability in the district.
53. Another option is to prescribe a criterion for qualifying developments that specifies that a minimum percentage of dwellings be studio apartments of a maximum floor area ie. 40 square metres. This is considered a better option than specifying price points. Discussion with professionals both at the Council and in private practice in Auckland has indicated that utilising this price point approach has proven problematic, and the Auckland experience is that the means of developers achieving the price point is usually through a small apartment typology in any event.
54. Specifying a criterion requiring a minimum percentage of dwellings comprise a gross floor area no greater than 40 square metres should help address affordability in some form. At the very least, it will avoid the situation where developers may construct a development that largely comprises larger 2-3 bedroom apartments, which will inevitably hit the market at a much higher price, or demand much higher rentals to justify a good financial return for investors.
55. Between 30 and 40 square metres is a typical floor area for a studio apartment.
56. It is recommended that a criterion for qualifying developments be that at least 30% of dwellings have a gross floor area no greater than 40 square metres. A requirement of 30% has been selected so that on mid to large scale projects the provision of studio units is meaningful, however care has been taken not to set this requirement too high so as to potentially undermine commerciality (for example, lending for developers can potentially become more challenging where the majority of units in a proposed development are of a small size).

Community Housing

57. It is acknowledged that the Lead Policy contains principles relating to community housing. However, the Lead Policy is a guiding, non-statutory policy document rather than a document that mandates matters, and needs to be applied within the context of each particular case and within the legal parameters of HASHAA. Legal advice received states that over-reliance on the terms of the Lead policy can lead the Council into legal error.
58. Compared to SHAs proposed by landowners where the Council can secure a commitment to community housing by stakeholder deed, in this instance that approach is not feasible due to the proposed SHA covering a large number of sites rather than one site where commitments can be locked in.

59. Under HASHAA, it is not possible to impose a criterion for qualifying developments mandating a provision of community housing. As outlined above, it is possible to impose criteria around housing affordability, either directly (ie. price points) or indirectly (ie. dwelling or section sizes)

Building height

60. Building height is a specific matter for consideration within HASHA and the Council's Lead Policy. The proposed BMU Zone is ideally located for additional height, as much of it backs Queenstown Hill and there are few existing residential neighbours who could be affected by larger buildings. The PDP introduces more permissive building height controls:

- up to 12m building height as a permitted activity; and
- up to 20m as a restricted discretionary activity.

61. It is recommended that one of the criteria imposed for qualifying developments should be a maximum height limit of 20m. This would mean that any application for a development that exceeds this height would not qualify for consideration by Council under HASHA, though an application for consent under the RMA could always be brought.

62. The PDP includes recession planes for any properties that adjoin residential neighbours. Any breach of recession planes in an application for consent under HASHAA would be a relevant consideration for the Commissioners hearing the consent application. Also, the Council would have a discretion to notify adjacent neighbours affected by a breach of a recession plane of the application under HASHAA and they would have the opportunity to make submissions, and this would be considered in decision making. In this way the SHA process is aligned with the PDP process and ensures that potential effects on any existing residential properties are addressed through the consent process.

Housing Accord targets and potential yield

63. The Housing Accord sets the following targets:

- Year 1: 350 sections / dwellings consented
- Year 2: 450 sections / dwellings consented
- Year 3: 500 sections / dwellings consented

64. The Year 1 target has been met. The next targets are higher; hence additional consents from SHAs may be required over and above usual building and resource consents.

65. The potential yield from the SHA for the proposed BMU Zone is not known. Theoretical yield is likely to be upwards of 500 apartments, but a realistic expectation could be estimated to be 100 – 150 apartments consented over the next two years, assuming two or three sites were developed at a moderate scale.

Significance and Engagement

66. This matter is of medium significance, as determined by reference to the Council's Significance and Engagement Policy because:

Importance: The matter is of significant importance to the District;

Community Interest: The matter is of significant community interest; and

Existing Policy and Strategy: The matter is consistent with Council's HOPE strategy, the Queenstown Housing Accord and the Council's Lead Policy on the Housing Accord, and the Proposed District Plan.

Risk

67. This matter relates to the strategic risk SR1 'Current and future development needs of the community (including environmental protection)' as documented in the Council's risk register. The risk is classed as high. This is because of economic, social, environmental and reputational risks.

68. It should be noted that a key element of this risk is meeting the current and future development needs of the community. This risk relates more to the economic and social consequences of not meeting development needs, which includes housing provision. The matter therefore can be considered to mitigate the risk of not meeting these needs.

69. The recommended option considered above mitigates the risk by: treating the risk and putting measures in place which directly impact the risk. Essentially, it is a pro-active step to addressing a significant political issue in the District.

Financial Implications

70. There are no direct financial implications resulting from the decision. In terms of impact on infrastructure, development contributions will be charged as developments progress. Unlike some greenfield development scenarios, existing infrastructure is available to utilise.

Council Policies, Strategies and Bylaws

71. The following Council policies, strategies and bylaws were considered:

- Council's Lead Policy on the Housing Accord and Special Housing Areas: provides non-statutory guidance on Council's assessment of SHAs
- Operative District Plan: relevant as it is the document that currently regulates housing development and urban growth management.
- Proposed District Plan: relevant as it is the document that regulates residential development in the proposed Business Mixed Use Zone.

- HOPE Strategy: relevant as it seeks to address the housing affordability issue in the District
- Economic Development Strategy: a key action is to “investigate all options for improving housing affordability in the District”
- 2014/2015 Annual Plan: A number of Community Outcomes are relevant, as they relate to the economy, and the natural and built environment

72. The recommended option is generally consistent with the principles set out in the named policies. In particular this proposal is intentionally aligned with the Proposed District Plan. SHAs also help deliver on the HOPE Strategy and the Economic Development Strategy.

Local Government Act 2002 Purpose Provisions

73. The recommended option:

- Will help meet the current and future needs of communities for good quality local infrastructure, local public services, and performance of regulatory functions in a way that is most cost-effective for households and businesses;
- Can be implemented through current funding under the 10-Year Plan and Annual Plan;
- Is consistent with a number of the Council's plans and policies, but noting some inconsistency with the District Plan; and
- Would not alter significantly the intended level of service provision for any significant activity undertaken by or on behalf of the Council, or transfer the ownership or control of a strategic asset to or from the Council.

Consultation: Community View and Preferences

74. The Council is responsible for giving appropriate consideration to the views of persons likely to be affected by, or to have an interest in, the decision. Neither HASHA nor the Council's Significance and Engagement Policy require the use of the special consultative procedure for this decision. The persons who are affected by or interested in this matter are ratepayers / residents in the Wakatipu Basin, particularly those within the operative Business Zone or in neighbouring residential zones.

75. No specific consultation has been undertaken in regard to this proposal. The Council's Lead Policy suggests that some community engagement is appropriate. However, the PDP was notified in August 2015 and the community has had several months to review the new intentions and rules for the proposed BMU Zone, and lodge submissions if desired.

76. As the proposed SHA closely aligns with the PDP BMU Zone and submissions appear, for the most part, to be in general support, the Council may consider that the views of the community about more intensive housing development in the proposed BMU Zone are sufficiently clear that the benefits of undertaking a

further consultation process specific to this SHA proposal are outweighed by the costs of doing so.

Attachments

A Infrastructure Report



REPORT

STRUCTURAL AND CIVIL ENGINEERS

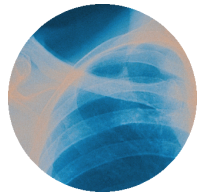
QLDC BMU INFRASTRUCTURE ASSESSMENT

PREPARED FOR

QUEENSTOWN LAKES DISTRICT

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QLDC BMU Infrastructure Assessment

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INTRODUCTION

Holmes Consulting Group LP (HCG) have been engaged by the Queenstown Lakes District Council (QLDC) to provide a high level assessment of the existing Three Waters infrastructure within the geographic areas covered by the Proposed Business Mixed Use Zone in the vicinity of Gorge Road. It is proposed that this area is designated as a Special Housing Area. As such, the purpose of this assessment is to investigate the ability of the Three Waters network (water supply, stormwater and wastewater) to be able to support the level of development intensification this new designation would enable and to identify any geographic areas of this zone which should be excluded from the SHA area due to difficulty in servicing efficiently.

LIMITATIONS

Findings presented as a part of this project are for the sole use of Queenstown Lakes District Council in its evaluation of the subject properties. The findings are not intended for use by other parties, and may not contain sufficient information for the purposes of other parties or other uses.

Our assessments are based on a desk study only. Condition assessments of existing infrastructure have not been undertaken and it has been assumed that any deficiencies due to damaged or aged infrastructure will be addressed within existing renewals budgets.

Our professional services are performed using a degree of care and skill normally exercised, under similar circumstances, by reputable consultants practicing in this field at this time. No other warranty, expressed or implied, is made as to the professional advice presented in this report.

BASIS OF ASSESSMENT

We understand that the proposed changes to these zones are expected to result in a low yield of additional dwelling units, and underlying conditions such as site coverage rules will not be exceeded. Because site coverage will not increase, and outdoor living areas need to be maintained, the additional stormwater flows are expected to be minor increases over the current design allowances, associated mainly with additional driveway areas. Water demand associated with smaller lots is expected to result in a higher domestic demand, but arguably a lower irrigation demand. This is also expected to result in minor increases when averaged across the zones. The wastewater demands have the most potential to increase demands, however, advice from Rationale Ltd (who operate the Wakatipu wastewater model) is that the low expected yield is not expected to significantly impact on existing infrastructure.

The assessment has therefore been carried out by identifying any network constraints/capacity limitations which may limit intensification of a particular location –



or require expensive upgrade works. Detailed assessments of the specific areas of the networks involved have not been carried out at the stage, but would be carried out for individual SHA proposals at the time of a consent application.

The areas of the wastewater network associated with the BMU zone have been previously assessed by Rationale as part of a high level test of capacity for a separate project. The results of this testing have shown that there are existing constraint issues within the Queenstown/Wakatipu Basin network that need to be addressed. The majority of these issues have already been programmed in to the LTP and involve trunk main capacity rather than pipe connections. As described above, it is anticipated that the increased wastewater flows that are likely to occur under the proposed SHA designation will not greatly increase these existing issues; the upgraded trunk mains will have some spare capacity. It is therefore considered that the wastewater network for the BMU area has sufficient capacity to continue achieving the existing levels of service should the new SHA designation go ahead. No specific comment on wastewater is therefore made under the separate area headings below, however, the planned upgrades should take into consideration the potential increase in flows as a result of the SHA designations.

Tonkin & Taylor (T&T) have assessed the water supply infrastructure for the BMU zone.

HCG have assessed stormwater request for service records from the previous 5 years to determine areas within the Wakatipu Basin that experience surface flooding during storm events that have not been attributed to blockages or damage to the network.

As noted above, it is expected that the increase in density in these areas will not significantly increase the stormwater runoff beyond what is currently anticipated set by site coverage rules that are not expected to change.

The resulting comments are provided below.



MIXED USE BUSINESS ZONE – GORGE ROAD

The proposed SHA area is situated on both sides of Gorge Road, between Industrial Place and Robins Road. The total area covers approximately 13 hectares of land on both sides of the road. The current zoning of these areas is Business, but it is proposed under the Proposed District Plan these areas would become Business Mixed Use, which allows for both Residential and Non-Residential activities.

Water Supply

No areas of constraint have been identified by T&T within the proposed Gorge Road SHA areas. The existing infrastructure should therefore be capable of servicing the increased level of development that could be enabled by the proposed change.

Stormwater

No flooding issues were noted in the request for service records for this area.

The developed area within this catchment is at the bottom of a steep sided valley and includes an open channel drain starting at the natural outlet of the Gorge Road wetland area to the north, becoming Horne Creek, which passes through Queenstown CBD. Sections of this drain are culverted. As no incidences have been reported it is anticipated that these culverts are operating below capacity. This is also true for the lateral network that feeds this drain.

It is noted that Horne Creek has a history of flooding in large rainfall events, and as a result, the Memorial Grounds adjacent to the Queenstown Memorial Hall are a designated overflow area for the stream to alleviate short term peaks. This overflow basin has spare capacity and therefore any issues downstream of this point in large scale flood events are thought to be mitigated.

A more detailed assessment will be required to ensure any significant increase in development density would not overwhelm the culverts. This would include, culvert flow rate analysis and calculating the increased stormwater runoff rates.



CONCLUSIONS

The wastewater network has a number of known constraints, specifically within the trunk mains. Upgrades to the network have been proposed to deal with these known constraints, and the advice received is that the upgrades have sufficient spare capacity to handle the potential increase in demand as a result of the SHA proposed. However, it is recommended that the increased demand is taken into account when the design of any upgrade is finalised.

Other than the wastewater upgrades described above, the Gorge Road Business Mixed Use area can be designated as an SHA without requiring significant new upgrades (other than those already proposed for the wastewater network) to the Three Waters network.