

Dear Commissioners,

Thank you for the opportunity to further submit on plan change 50. I apologise that I will be in Auckland when the hearing recommences and so unable to attend. Further, due to prior commitments until we leave tomorrow, I am unable to do anything but briefly touch on one issue, affordable housing.

I note Mr Kyle's evidence suggests that "the approach taken to PC50 is aligned with the approach required under the District Plan's affordable housing provisions (derived via Plan Change 24). The district plan based affordable housing methods are fairly limited. For the zones affected by PC50 (High Density Residential and the Queenstown Town Centre Zones), the affordable housing provisions relate to an assessment matter that applies to non-complying resource consent applications."

I believe this interpretation is incorrect. PC 24 is specifically to be applied at the stage of assessment of proposed changes to the district plan. This is to address the issue of up-zoning and the corresponding increase in value the landowner receives. Council is in this case the beneficiary - and so the onus is on Council to ensure that PC 24 is applied to it as Council would expect it to be applied to others.

For Mr Kyle to put the onus on achieving any affordable housing on subsequent decisions on noncomplying resource consent applications through PC 50 is disingenuous. Especially as the allowances are so generous that they are unlikely to be breached and therefore the paltry change suggested is rendered irrelevant.

The plan change, as already stated in my initial submission, does not commit to achieving any of PC 24's three policies.

I reiterate my initial submission, pointing out that three specific, unanimous and unambiguous resolutions committed Council to ensuring affordable housing was provided on this land.

The second resolution referred to was the December 19, 2013, resolution to include as one of the development principles of the Lakeview site the following: "development at the site mitigates any adverse impact on housing affordability and ensures that equivalent affordable housing options are enabled in a manner consistent with the stakeholder Deed agreed to as part of plan change 24."

This site then and still currently provides affordable housing for around 300 people. Stakeholder deeds agreed to as part of Plan Change 24 have generally ranged between two and five per cent of the value of developed sites. Note that this resolution is conjunctive, not disjunctive. Council should not abrogate its responsibility just because it has the power to do so.

The third Council resolution that PC 50 wilfully ignores is that of October 12, 2009, in which Council specifically identified the Lakeview site as one on which the Council shall apply the provisions of Plan Change 24 when progressing development of council owned land.

I do not believe that these strong commitments from Council's governance arm have been reflected in the plan change as presented or amended. As a councillor of seven years, it is extremely

disappointing that this quite clear political directive - committed to unanimously through proper political process -has been ignored by those preparing PC 50 and responding to public submissions.

As I was not able to be at the meeting - as the PC 50 zone was extended to cover a property we own without any councillors knowing, including the Mayor - I do not know if this issue was discussed during the less than half hour long meeting that passed the 800 page plus PC 50 report. I can only assume it was not highlighted as a breach of council directive. Discussion was not reflected in the minutes.

I am sorry I do not have an opportunity to dedicate the time I would like to this submission and analysing Council's evidence in response to all submissions. I can only bring to your attention the issues that I hope Mr Kyle and co have adequately responded to:

- whether analysis of the need for town centre expansion justifies the extent to which PC 50 does so? Or will it actually kill the CBD through diluting the town centre zone?
- Does PC 50 as adapted integrate with the adopted Queenstown Town Centre chapter of the District Plan Review into which it will be embedded? I asked that our District Plan Review manager Matthew Paetz send you this immediately after the initial hearing, so trust you have it to work with. In particular, this refers to maintaining a reasonable level of residential amenity within and beyond the town centre and creating a compact town centre that is safe and easily accessible.
- The need for good urban design outcomes and in particular, the benefits of urban design panel review, ensuring increased height does not result in dominant monoliths without view shafts and the need for an outline plan to give some assurance that we will not end up with fragmented, ad hoc and disjointed development.

Thank you for your efforts to ensure that Plan Change 50 is not a plan change that residents live to regret.

Kind regards,

Cath Gilmour