

To

To – Queenstown Lakes District Council

Browns Boutique Hotel – Gillian & Donald McDonald

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This Submission relates to - Plan Change 50

Queenstown town centre is the iconic heart of the district a beautiful town surrounded by a dramatic landscape and a lively town centre.

I doubt risk of commercial growth at Frankton will affect the 61% of international visitors (and even NZers) who prefer to stay in the town.

There is a much larger risk that they are “turned off” by such large scale development in central Queenstown to the financial detriment of the town and find alternative beautiful places to stay.

Many of our guests comment that they did not realize Queenstown would be so BIG – voiced in a negative way. Some guests only stay for 1 night and stay longer nights in Te Anau and Wanaka. This is counter to what we want to happen.

Specifically our submission relates to:

Isle Street Sub Zone – specifically the block bounded by Hay, Isle, Brecon and Man Streets.

Object to - proposed height restrictions

Objecting to – Site coverage

Objecting to - the amalgamation of small sites

Objecting to - car parking provisions

Objecting to – Rating same as Town Centre

Our Submission is -

Height Limits

The proposed height limits are out of scale for this area.

The 15.5 metres on sites with dual frontage over 2000 metres will create a “big box” effect and is inappropriate for this zone with its sloping sections.

This will create significant shading of adjoining properties.

The 12 metre proposal on smaller sites is also too high.

The town centre high limits works because buildings are on flat land. Imposing these heights on the higher contours of the Isle Street Sub Zone buildings block views and reduce property values & business viability of affected property owners in this zone.

Site coverage

The proposed site coverage of 70% is too intensive. This will lead to minimum set backs between properties. It will take away the views of Queenstown Bay and the downtown area from any properties without a frontage to Man Street.

It will also mean there is no space for onsite parking.

Amalgamation of small sites

The proposal to allow the amalgamation of 2000 metre sites (4 existing sites) should not be allowed. Buildings of this scale will dwarf the area and the CBD.

Car Parking Provisions

The proposed plan change does not allow for enough onsite car parking.

There is a lack of street parking in down town Queenstown and local people and visitors are parking along the outer perimeters. Hay, Man, Isle & Brecon Streets are very congested.

It is incorrect to assume that visitors staying in town will not need cars. All our guests are independent travellers and 70% of them have cars. We have parking for 50% of our guest rooms and that is not enough.

We seek the following from the local Authority -

Height Limits

Retain the current high density limits and rules for the Isle Street Sub Zone.

Given the sloping contours, alternatively a 5 metre height restriction on the Man Street rear boundaries and allow them a horizontal plane towards Man Street to a maximum of 12 metres.

For the Lakeview site with frontage to Isle and Hay Street a generous set back of 50 metres or a 7 metre height restriction within 50 metres of the street frontage.

Site Coverage

Rather than have separate standards for residential and non-residential as is currently the case, we think the maximum site coverage for all should be 55% .

This would allow room for some onsite parking, and encourage open areas and lanes between buildings and create a continuation of the “village feel” in Arrowtown and areas of the Queenstown CBD.

Amalgamation of Small Sites

The amalgamation of 2000 metre sites should not be allowed.

Car Parking

Current high density rules should apply to residential use of any building.

All new commercial accommodation builds should have underground parking if there is not sufficient space for outside parking.

Onsite parking for retail should be required for staff and customers.

Rates

The existing rates for Isle /Man Streets should be retained. The higher town centre rates would be a financial burden on existing businesses in the zone.

**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **IHG Queenstown Ltd and Carter Queenstown Ltd**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan.

IHG Queenstown Ltd and Carter Queenstown Ltd (IHG) could not gain an advantage in trade competition through this submission.

1. The specific provisions of the proposal that IHG's submission relates to are:

1.1 The Plan Change in its entirety.

2. IHG's submission is:

2.1 IHG supports the plan change, including:

- the need for additional town centre zoned land,
- the rezoning of the land bound by Lake Esplanade, Lake Street, Man Street and Hay Street to Queenstown Town Centre Zone;
- subject to the relief set out in this submission.

2.2 Notwithstanding IHG's general support of the plan change, it raises some points of detail in Proposed Plan Change 50 that it wishes to see remedied through the plan change process.

Noise (Rule 10.6.5.2 (ii) (b), page 10-15)

2.3 The submitter seeks the removal of a specific noise rule for the block of land bound by Lake Esplanade, Lake Street, Man Street and Hay Street. Instead it seeks the application of the operative town centre-wide noise rule.

Reasons

2.4 The proposed plan change applies noise rule 10.6.5.2 (ii) (b), at page 10-15 to the the subject block. This is the same rule that also applies to the nearby Town Centre Transition Zone. This noise rule is 10dBA L_{Aeq} (15 min) below the rest of the Town Centre zone during both day-time and night-time.

- 2.5 The reason for this appears to be based upon mitigation of noise effects upon the residential area on the opposite side of Lake Street. However this rule does not apply to other fringe areas of the Queenstown town centre, and is considered to be unnecessary.

Verandahs (Rule 10.6.5.1 (vi), page 10-6)

- 2.6 The submitter seeks deletion of Rule 10.6.5.1 (vi) which requires the provision of a veranda along the Hay Street frontage of its land.

Reasons

- 2.7 The operative plan includes a rule requiring the provision of a veranda along the frontage of Hay Street when any building on that frontage is 'erected, reconstructed or altered'. The Plan Change amends the rule to refer to the streets between which the rule applies; to between Beach Street and Man Street (previously the reference was simply to Hay Street).
- 2.8 Prior to Plan Change 50, the only land affected by this veranda rule is the land on the eastern side of Hay Street, as prior to notification, the submitters land along the western side of Hay Street was included in the High Density Residential Zone.
- 2.9 This rule now affects the submitters land; a distance of approximately 70m, of which 30m of this frontage is currently a very steep section of unformed legal road which comprises a series of winding footpath and steps.
- 2.10 Whilst the submitter accepts that pedestrian weather protection is appropriate in a town centre environment, the scope of this proposed rule would involve a substantial structure that may not necessarily provide any practical benefit.
- 2.11 The operative plan already requires that Controlled Activity consent is sought in respect of verandas within the Town Centre Zone, which enables amongst other things consideration of design, appearance, materials and impacts upon and relationship to other verandas (10.6.3.2 (ii)).

3.0 I seek the following decision from the local authority:

1. *The inclusion of the land bound by Lake Esplanade, Lake Street, Man Street and Hay Street within the Queenstown Town Centre Zone, with provisions as set out in Plan Change 50 as notified (amended in accordance with this submission)*
2. *The removal of a specific noise rule for this block of land, and, instead the application of the operative town centre-wide noise rule for this block of land*
3. *The deletion of Rule 10.6.5.1 (vi) which requires the provision of a veranda along the Hay Street frontage of its land.*

4. *Any other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.*

4.0 I wish to be heard in support of my submission.

5.0 I would not consider presenting a joint submission, as this submission contains matters specific to the submitter



John Edmonds

(authorised to sign on behalf of submitter)

10 October 2014

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**Submission on Plan Change 50 to the Queenstown-Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **Watertight Investments Ltd**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. Watertight (Watertight) could not gain an advantage in trade competition through this submission.

1. The specific provisions of the proposal that Watertight Investment Ltd's submission relates to are:

1.1 The Plan Change in its entirety.

2. Watertight's submission is:

2.1 Watertight is the owner of land at 50, 52 and 54 Camp Street. The combined land area of these sites totals approximately 1500m².

2.2 Watertight supports the intention to rezone 50 to 54 Camp Street Town Centre Zone. It is considered this is a rational extension of the town centre, with the area being located near the existing town centre, transport routes, public car parking, and in an area where commercial activities have already established. In particular, it is noted that extending the town centre to this land is consistent with the 2009 Queenstown Town Centre Strategy and the consultation material produced by Council as part of the District Plan review in 2012.

2.3 Watertight does however have concerns about some of the rules proposed in the Isle Street subzone under Plan Change 50. With respect to building height controls, the need for a recession plane control is questioned. In particular, it is considered that a 45 degree recession plane starting 5m above the boundary is overly restrictive and could result in poor design outcomes including unattractive built forms.

2.4 Further, there are some unclear matters with respect to the controls on height. It is questioned how easily and consistently the matter of what a 'northern boundary' will be interpreted with respect to the recession plane rule (it may, for example be more efficient to name the street boundaries to which this rule applies rather than refer to cardinal points). It is also unclear whether the rule applies for boundaries between sites held in common ownership (and it is submitted that this should not be the case). And it is unclear whether the roof bonus rule provides an exemption from the recession plane requirement, or only the overall 12 metre height limit.

2.5 It is also questioned how reasonable and practical the rule preventing the parking of cars within front yards within the Isle Street subzone is. There are and will continue to be many residential properties where this practice can reasonably be expected to continue in this subzone. And given sites in this subzone typically have quite narrow frontages and are relatively steeply sloping, it is not clear that this standard will prove practically achievable while allowing reasonable development of a site.

I seek the following decision from the local authority:

1. To confirm 50, 52 and 54 Camp Street as part of the Queenstown Town Centre Zone.
2. To remove or amend the internal boundary recession plan rule as it applies to the Isle Street subzone, so as to allow greater building height closer to boundaries, to clarify the rules and to exempt the rule's application from boundaries between sites held in common ownership.
3. To remove the rule that seeks to prevent car parking in front yards in the Isle Street subzone.
4. Any such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.

I wish to be heard in support of my submission and would consider presenting a joint case with other submitters.



(Signature of person authorised to sign on behalf of submitter)

10 October 2014

(Date)

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**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **Ngai Tahu Tourism Limited**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. Ngai Tahu Tourism Ltd (NTT) a subsidiary of Ngai Tahu Holdings Corporation Ltd. The submitter could not gain an advantage in trade competition through this submission.

1.0 The specific provisions of the proposal that NTT's submission relates to are:

1.1 The Plan Change in its entirety.

2.0 NTT's submission is:

2.1 NTT supports the plan change, subject to the relief set out in this submission.

2.2 NTT has an interest in leasing approximately 7,500m² of land located to the west of the intersection of Man and Thompson Streets, generally indicated as 'reserve' on Figure 2 of the 'Lakeview Sub-Zone Structure Plan' (page 10-17 of the proposed plan provisions). It is NTT's intention to establish a commercial hot pool facility on this land, together with associated spa treatment rooms and ancillary retail, service and administrative activities (the scope of which have not yet been determined). This submission refers to the land as the 'lease area'.

2.3 It is NTT's objective through this submission to ensure that the proposed plan provisions do not frustrate their ability to establish such facilities upon that land. If a lease were to be granted, the proposed rules as notified would restrict the ability of NTT to establish and operate a world class hot pool facility on the land and this submission seeks to remedy that.

2.4 The key aspects of this submission relate to the proposed rules on:

- Car-Parking;
- Protected Trees;
- Active Frontages;
- Building Height;
- Viewshafts; and
- Widening of Thompson Street

- 2.5 Together these rules create uncertainty as to the amount of land that would be available for use for a hot pool facility.
- 2.6 The relief sought is set out in italics. As a preliminary matter, the submitter seeks clarity over land status.

The 'Reserve' status over land within the Plan Change area

- 2.7 That area identified as the Lakeview Sub-Zone contains a combination of freehold and reserve land. The general split is freehold land over the western half of the sub-zone, and reserve land over the eastern half.
- 2.8 The Plan Change indicates the spatial reorganisation of these areas. As part of this reorganisation the 'lease area' is to change from freehold to reserve.
- 2.9 It is unclear through these provisions whether the 'reserve' will be vested and gazetted as a Reserve under the Reserves Act 1977. It is also unclear whether any land that is vested as a Reserve will also be designated in the District Plan as a Reserve. If so, the rules affecting that future designation remain uncertain.

The submitter seeks confirmation from the Council on the subsequent status of the land as a Reserve and in respect of any subsequent future Designations or Notices of Requirement and the rules that apply.

Car-Parking

- 2.10 The Plan Change provisions amend the car-parking rules at pages 14-14 to 14-17.
- 2.11 In most cases the plan change intends to exclude on-site parking requirements in the Lakeview sub-zone for commercial activities.
- 2.12 The introductory rule (14.2.4.1 (i)(a)) has been amended, although it appears inadvertently, to now require car-parking throughout all of the Town Centre zones.
- 2.13 The operative rule and proposed rules read as follows:

Operative District Plan Provisions:

(a) Activities in the Town Centre Zones, excluding the Town Centre Transition sub-zone, which shall be subject to the existing car parking requirements.

Proposed Plan Change 50 Provisions:

(a) Activities in the Town Centre Zones, (excluding the Town Centre Transition sub-zone and the Town Centre Lakeview sub-zone), which shall be subject to the existing car parking requirements.

- 2.14 This amendment appears to unintentionally require car-parking in the Town Centre zones, with the exception of the two mentioned sub-zones. A minor amendment needs to be made to reverse that.

(a) Activities in the Town Centre Zones, excluding the Town Centre Transition and Town Centre Lakeview sub-zones, which shall be subject to the existing car parking requirements.

- 2.15 With respect to the 'lease area', it is intended to establish and operate a commercial hot pools. This activity is most closely described as a 'Commercial Recreation Activity' within the District Plan.
- 2.16 Plan Change 50 generally excludes any on-site parking for commercial activities in the Lakeview sub-zone, with the exception of 'Commercial Recreation Activities', 'Convention Centres' and 'Visitor Accommodation'
- 2.17 In the case of 'Commercial Recreation Activities' the on-site parking requirement is proposed at '1 parking space per 5 people the facility is designed to accommodate'.
- 2.18 The Traffic Design Group Report (Appendix I to the AEE) suggests a maximum occupancy of 500 people, which would result in 100 on-site car-parking spaces being required for the 'lease area'.
- 2.19 Typically each carpark occupies about 30m² (including manoeuvring space), which would result in at least 3,000m² of the 'lease area' being required for parking. This would make the hot pools project entirely unfeasible.
- 2.20 It is noted that within the operative plan there is no parking category for 'Commercial Recreation Activities', the closest category being 'Commercial Activity' at 1 space per 25m².
- 2.21 The submitter acknowledges that the provision of parking is necessary, however the comparison with other hot pools (Mt Maunganui and Hanmer) is not appropriate as both of those comparison hot pools are destination hot pools, which result in specific vehicle trips. The proposed NTT hot pools would be associated with other activities and facilities and located close to existing forms of accommodation. Without any new hotels being constructed within the Lakeview Sub-Zone, there is almost 1,000 existing hotel rooms within a radius of 750m of the 'lease area'. The submitter already operates a fleet of mini-coaches and it would be intended to utilise these vehicles to provide a regular pick-up and drop-off service from the town centre to the hot pool facility.
- 2.22 Current market research undertaken by the submitter indicates that the busiest operating times for the hot pools would be during the early evening; generally when commuter parking demands are at their lowest for facilities such as the Man Street carpark.

- 2.23 In the case of Plan change 50, the TDG report acknowledges that there is likely to be “a significant proportion of hot pools custom could be generated from the immediate vicinity of the site, both within the Lakeview sub-zone and the wider local residential and visitor accommodation catchment..... there is potential for a significant proportion of hot pools customers to arrive on foot¹”. On this basis it would appear that a much lower on-site parking requirement would be necessary.
- 2.24 The TDG report also acknowledges that there would be likely to be “significant sharing of parking both out into the wider Queenstown parking environment (kerbside, plus say Man Street car park) and with other facilities / attractions within the Lakeview site (e.g. convention centre)”. Yet, even on the basis of likely shared parking, multi-purpose visits, pedestrian accessibility the recommendation is for 1 space per 5 guests. This 1:5 figure is consistent with Mt. Maunganui and Hanmer parking requirements set out in the TDG report, but should be amended in this case to reflect the unique circumstances set out in paragraph 2.21, 2.22 and 2.23 above.
- 2.25 It is noted that the Transport section of the District Plan does make limited provision for shared parking arrangements; but only in the case of residential or visitor accommodation activities. Given the acknowledgement by the TDG report that there is likely to be a ‘significant’ amount of shared parking – it is considered appropriate that such provision should be incorporated into the rules.

The submitter seeks:

- *That the requirement for Commercial Recreation Activities in the Lakeview Sub-Zone be deleted; or*
- *A substantial reduction in the on-site car-parking requirements.*
- *That in either case that there also be provision for car-parking requirements to be met by the use of shared off-site car-parking.*
- *The identification of a publically owned communal parking facility*

Protected Trees

- 2.26 The District Plan maps indicate a cluster of protected trees in the vicinity of the ‘lease area’.
- 2.27 The ‘Figure 2 – Lakeview Sub Zone Structure Plan’ suggests the possible location of these trees as a faintly drawn group of circles, both within the lease area, and also under the proposed ‘road’ and area described as a ‘square’.

¹ Traffic Design Group, Integrated Transportation Assessment Report, 12 August 2014, page 28, 6.2.4 Hot Pools

- 2.28 The Planning map (#35) signals the presence of this cluster of trees with a single notation of #214. The associated 'Inventory of Protected Features (page A3-16 of the operative district plan) more fully describes this notation as representing:
- 2 Wellingtonias
 - 6 Oaks
 - 4 Cedars
- 2.29 These trees are briefly discussed at pages 58 and 69 of Appendix G (NZ Heritage Properties Ltd report) to the Plan Change as being of significance.
- 2.30 The operative heritage trees rules require that any structures be located outside of the drip-line of such trees. In the case of mature trees such as these, it is likely that an arborist would require a greater separation. Previous reports have suggested that, for example, that one of the Wellingtonia trees have a 'root protection area' radius of 11.2m, while one of Cedars may have a RPA of up to 18m.
- 2.31 It would appear that a grouping of six Oak trees occur in the north-west corner of the proposed 'lease area' – and that probably one of the large Cedars(or at least its RPA) is also within the 'lease area'. The combined 'root protection area' of the Oak trees has been previously estimated at approximately 1,900m², while the Cedar has a 'rpa' of approximately 1,100m² (of which at least half would be within the 'lease area'.
- 2.32 The actual area of land that needs to be set aside for tree protection has an overall effect on the amount of usable land

The submitter seeks that the location of the trees and the tree-root protection areas be more accurately defined through this plan change.

Active Frontages

- 2.33 The Structure Plan (Figure 2 at page 10-17) indicates a solid red line around most of the eastern and the entire northern boundary of the proposed 'lease area', which represents an 'active frontage area'. This is cross-referenced to proposed Rule 10.6.5.1 (xiv) at page 10-12.
- 2.34 This proposed rule is not entirely clear, however it may be interpreted to require that where any building is located along that 'active frontage' that such a building must be developed so that most of (80%) of the buildings frontage must be glazed and unobstructed. The rule also requires that any building along that frontage have a minimum depth of 8m, and that the building must have a minimum internal floor height of 4.5m. The height rules also separately provide for an additional (optional) 2m of building height that can be used for roof articulation purposes.
- 2.35 Any breach of this rule would require a Restricted Discretionary activity resource consent.

- 2.36 If a hot pool facility is developed on this land, then a building comprising reception, administration, and associated customer services areas will be required, although only along part of the northern or eastern frontage of the site. The location of existing protected trees would limit the ability to develop across the north-east part of the 'lease area'.
- 2.37 Additional structures will also be required for customer changing facilities, maintenance etc. The location of these structures has not been confirmed, but not necessarily along the frontages of the site.
- 2.38 If the intent is to vest the 'lease area' as a reserve, then in most cases it would be unusual for the development of an active retail frontage along two boundaries of a reserve.
- 2.39 The submitter considers that while the active frontage rule has merit within the other locations shown on the 'Figure 3 - Lakeview Sub-Zone Structure Plan', that such a requirement would not be appropriate, achievable nor desirable within the 'lease area'. The constraints that apply to this particular parcel of land, as a result of the protected trees, the associated root protection areas, and the street layout of the structure plan limit the ability of this land to provide the active frontages. The submitter seeks that the active frontage rules are deleted from this area, to enable an appropriate level of design flexibility.

The submitter seeks that the 'active frontage' areas shown on the Figure 2 Structure Plan, as they relate to the 'lease area' be deleted.

Building Height

- 2.40 Building height within the plan change area varies considerably.
- 2.41 The 'Figure 3 - Lakeview Sub-Zone Height Limit Plan' (page 10-18) indicates a 4.5m height limit for the 'lease area'.
- 2.42 At Page 27 of Appendix F to the AEE (the Urban Design Peer Review) the comment is made that the hot pools will be overlooked by taller buildings to the north, and therefore a 4.5m height limit is appropriate. The report also acknowledges the presence of protected trees in the vicinity.
- 2.43 However, the presence of these trees within the lease area, and other protected trees in close proximity will most likely restrict any views from these possible 'taller buildings to the north' from overlooking the 'lease area'.
- 2.44 The submitter considers that a 4.5m height limit is unnecessarily restrictive.

- 2.45 The height limit currently applying to any buildings within Recreation Reserves within the Town Centre Zone is 8m (refer page A1-20 of the District Plan)

The submitter seeks that the proposed PC50 rules for building height within the 'lease area' are consistent with the rules for Recreation Reserves, and amended to a maximum height of 8m.

Viewshafts

- 2.46 The Plan Changes introduces the concept of 'viewshafts' which are indicated on 'Figure 2 – Lakeview sub-zone Structure Plan', however they are not cross-referenced to any rule.
- 2.47 As a result the purpose of the viewshafts is unclear.
- 2.48 In some case they occupy areas on the Structure Plan that are shown as 'white', while in others they traverse areas that are indicated as 'reserve'.
- 2.49 In the case of the 'lease area' there are viewshafts along the eastern and western boundaries.
- 2.50 Where a viewshaft is indicated on a plan, then it must be supported by rules, that prevent or deter certain activities such as structures, planting of trees etc, while also enabling other activities. In this case there are none.
- 2.51 The end use of the viewshaft is an important consideration for the submitter, as that will impact upon the amenity and privacy of any hot pools that get developed. It is important that such viewshafts are limited to landscaping together with either pedestrian or cycle connections, but not for vehicular purposes.
- 2.52 The width of the western-most viewshaft is also a matter of concern for the submitter. This is indicated as being only 8m wide. Given the likely scale of adjacent development the submitter considers that a 20m wide viewshaft should be located along this boundary.
- 2.53 The submitter is also concerned that the viewshaft along the western boundary does not encroach upon the 'lease area', and seeks confirmation of its location. The submitter seeks amendment to proposed rule 10.6.5.1 (xiii), where it refers to the Structure Plan features having a potential 5m permitted variance, such that it does not apply to this viewshaft.

While the submitter supports the general principle of viewshafts, it considers that:

- *a policy and associated rule is necessary to implement an effective regime of viewshafts.*
- *neither viewshaft should be located within the proposed 'lease area'.*

- *that the western viewshaft should be widened to the width of a 'primary viewshafts' which appears to be approximately 20m wide.*
- *that the use of the viewshafts should be limited to landscaping and either pedestrian or cycle use, but not vehicular usage.*

Widening of Thompson Street

- 2.54 A further proposed rule creates uncertainty; Rule 10.6.5.1 (xiii) enables, at paragraph 3 of that rule, for an unspecified widening of Thompson/ Man Street realignment at any time.

The submitter seeks that the third paragraph of Rule 10.6.5.1 (xiii) either be deleted, or a more precise measurement of the scope of widening be provided.

Summary

- 2.55 As outlined in this submission, the area land available for lease (subject to negotiation), which is described as the 'lease area' is impacted upon by a number of proposed rules. These include the land allocated to the 'protected trees', whether land is to be set aside for 'active frontages', the amount of land to be set aside for on-site car parking. Additionally, the proximity of buildings on adjoining land will also have an impact on those parts of the 'lease area that will be appropriate for development, as will any rules affecting the future widening of Thompson Street.

The submitter seeks such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.

3.0 I wish to be heard in support of my submission.

4.0 I would not consider presenting a joint submission, as this submission contains matters specific to the submitter



John Edmonds

(authorised to sign on behalf of submitter)

10 October 2014

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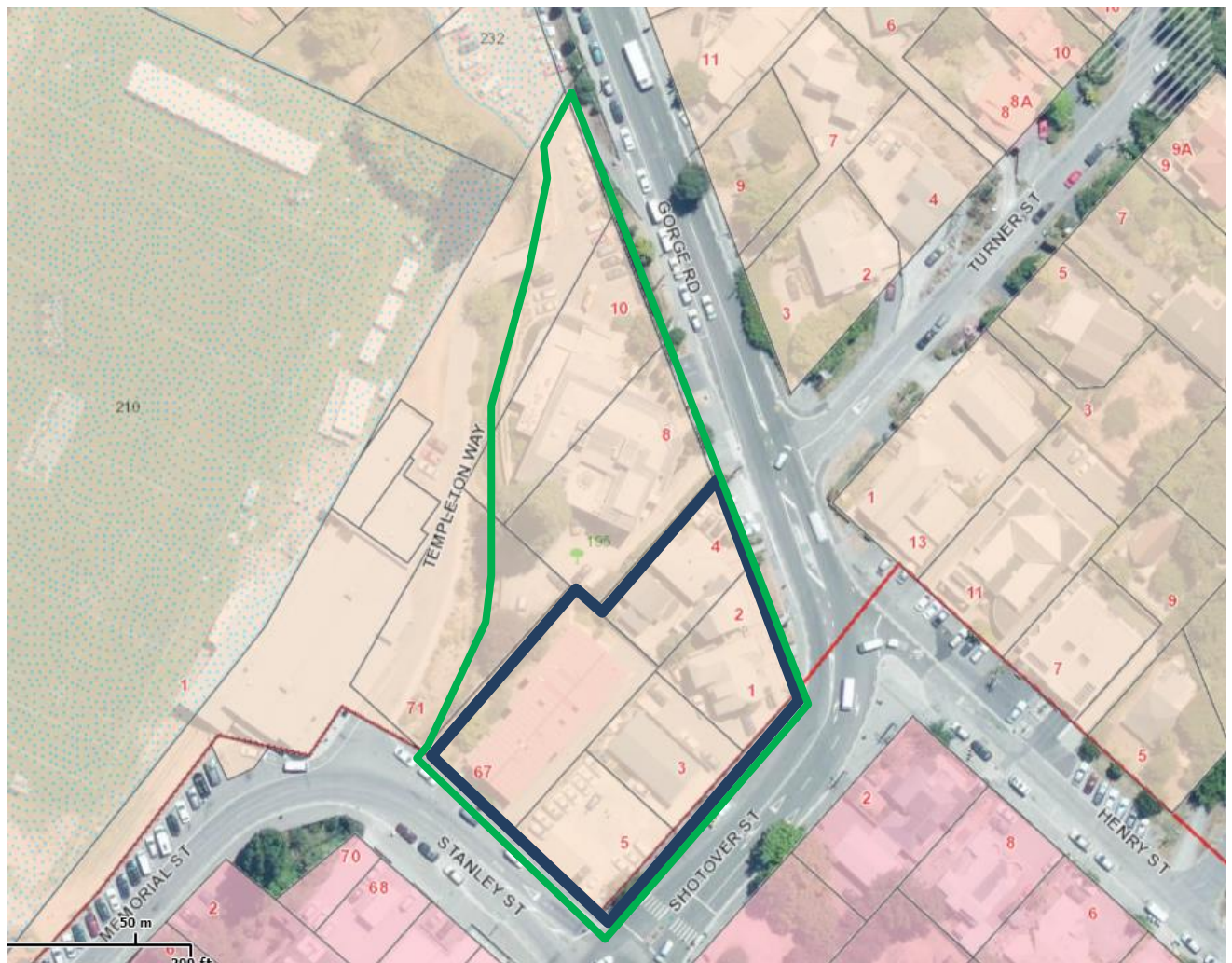
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**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **Kelso Investments Ltd and Chengs Capital Investments Ltd**

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- 1.1 This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan by Kelso Investments Ltd and Chengs Capital Investments Ltd (Kelso and Cheng).
- 1.2 Kelso and Cheng will not gain an advantage in trade competition through this submission.
2. The specific provisions of the proposal that Kelso and Chengs' submission relates to are:
- 2.1 The Plan Change in its entirety.
3. Kelso and Cheng's submission is:
- 3.1 Kelso and Cheng generally support the case set out in Plan Change 50 that there is a need to extend Queenstown's Town Centre Zoning (although the submitter is not necessarily convinced that scale of the extension proposed under Plan Change 50 is justifiable).
- 3.2 Kelso and Cheng conditionally support Plan Change 50, subject to the relief set out in this submission being granted.
- 3.3 Kelso and Cheng own five contiguous parcels of land, bordered by Stanley Street, Gorge Road and Shotover Street. These lots are:
- 1, 3 and 5 Shotover Street;
 - 67 Stanley Street (with the exception of one unit); and
 - 2 and 4 Gorge Road
- 3.4 These sites are outlined in blue in the image below:



- 3.5 The lots owned by the submitters are currently covered by a mix of ageing buildings, used for commercial visitor accommodation, offices and residential purposes, and commercial car parking. The land to the north is owned by Queenstown District Council and is used as Council offices, and further to the north of those offices is situated a public car park again owned by the Council.
- 3.6 When combined with the Council offices, the sites form a block of land naturally bounded by Shotover Street, Stanley Street, Templeton Way, Gorge Road, the Memorial Centre, Horne Creek and a Council reserve to the north (as outlined in green in the image above).
- 3.7 The submitters' sites are currently zoned High Density Residential Sub Zone A. It is submitted that this zoning does not reflect the historical or existing character of the sites and the surrounding land uses. Nor does this zoning represent the optimal future use of the sites. The submitter wishes to develop their properties in the near future, and an appropriate zoning would incentivise such development, improving the amenity of the sites and their surrounds.

- 3.8 Plan Change 50 proposes significant extensions of Town Centre Zoning to the northwest of the current Town Centre Zone. The majority of the proposed extension has only recently been contemplated by Council. By contrast, the 2009 Queenstown Town Centre Strategy and the 2012 District Plan Review consultation material indicated that the areas being contemplated by Council for extension of the town centre were primarily along Gorge Road (including the sites subject to this submission) and along Brecon Street (between Man Street and the Skyline Gondola base building).
- 3.9 It is submitted that the sites owned by these submitters, along with neighbouring properties owned by Queenstown Lakes District Council outlined in green in the image above, present a more logical and natural extension of the Town Centre Zone than much of what is proposed by Plan Change 50. The sites are located within immediate proximity of the existing Town Centre Zone. The sites already reflect a town centre character (as acknowledged in Council's 2009 Queenstown Town Centre Strategy) with typical town centre uses having been historically established on some of the sites. The amenity and character of the surrounding land uses would be compatible with the change in zoning sought by this submission. Reticulated services are already available and the sites are on existing transport routes and close to public car parking.
- 3.10 Further, and importantly, topography favours this change in zoning, supporting the logic of an extension of the Town Centre in this direction. There is no notable change in elevation between this area and the balance of the town centre, meaning pedestrians will easily travel between these and other town centre sites. In fact the area is already traversed by pedestrian routes between the town centre, Council offices, Library, Memorial Centre, retail activities and the public car parking on Gorge Road.
- 3.11 By contrast, the submitter has reservations about the suitability and practicality of much of the proposed new Town Centre zoning outlined in Plan Change 50.
- 3.12 The rezoning of the sites sought by this submission would be consistent with the settled objectives and policies of the Queenstown Lakes District Plan and would achieve the purpose of the Resource Management Act.
- 3.13 In applying the Town Centre Zone to the submitter's land, no amendments to the Town Centre provisions in the existing District Plan are required or sought.

4. I seek the following decision from the local authority:

- 4.1 Rezone to Queenstown Town Centre Zone:
- the area bound by Shotover Street, Stanley Street, Gorge Road, Horne Creek and District Plan Designation 232 (as outlined in green in the image in this submission); or alternatively,

- the area (outlined in blue in the image in this submission), being land owned or substantially owned by the submitter.
- 4.2 Any such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.
- 4.3 That if the relief sought in points (1) or (2) are not granted, the plan change should be declined in its entirety.

I wish to be heard in support of my submission and would consider presenting a joint case with other submitters.

A handwritten signature in blue ink, appearing to read 'Dan Wells'.

(Signature of person authorised to sign on behalf of submitter)

10 October 2014
(Date)

Address for service of submitter:

Kelso Investments Ltd and Chengs Capital Investments Ltd
C/- John Edmonds and Associates Limited
PO Box 95
Queenstown

Telephone: 03-450-0009
Email: dan@jea.co.nz
Contact person: Dan Wells

**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **C Hockey**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. C Hockey (Hockey) could not gain an advantage in trade competition through this submission.

1. The specific provisions of the proposal that Hockey's submission relates to are:

1.1 The Plan Change in its entirety.

2. Hockey's submission is:

- 2.1 Hockey is the owner of land at 4 and 8 Isle Street, and has an interest in 2 Isle Street. The combined land area of these sites totals 1700m². Hockey has business interests in providing backpacker accommodation on these and other sites and may wish to further develop the land for those purposes in the future.
- 2.2 Hockey supports the intention to rezone 2 to 8 Isle Street Town Centre Zone. It is considered this is a rational extension of the town centre, with the area being located near the existing town centre, transport routes, public car parking, and in an area where commercial activities have already established. In particular, it is noted that extending the town centre to this land is consistent with the 2009 Queenstown Town Centre Strategy and the consultation material produced by Council as part of the District Plan review in 2012.
- 2.3 Hockey does however have concerns about some of the rules proposed in the Isle Street subzone under Plan Change 50. With respect to building height controls, the need for a recession plane control is questioned. In particular, it is considered that a 45 degree recession plane starting 5m above the boundary is overly restrictive and could result in poor design outcomes including unattractive built forms.
- 2.4 Further, there are some unclear matters with respect to the controls on height. It is questioned how easily and consistently the matter of what a 'northern boundary' will be interpreted with respect to the recession plane rule (it may, for example be more efficient to name the street boundaries to which this rule applies rather than refer to cardinal points). It is also unclear whether the rule applies for boundaries between sites held in common ownership (and it is submitted that this should not be

the case). And it is unclear whether the roof bonus rule provides an exemption from the recession plane requirement, or only the overall 12 metre height limit.

- 2.5 It is also questioned how reasonable and practical the rule preventing the parking of cars within front yards within the Isle Street subzone is. There are and will continue to be many residential properties where this practice can reasonably be expected to continue in this subzone. And given sites in this subzone typically have quite narrow frontages and are relatively steeply sloping, it is not clear that this standard will prove practically achievable while allowing reasonable development of a site.

I seek the following decision from the local authority:

1. To confirm 2, 4 and 8 Isle Street as part of the Queenstown Town Centre Zone.
2. To remove or amend the internal boundary recession plan rule as it applies to the Isle Street subzone, so as to allow greater building height closer to boundaries, to clarify the rules and to exempt the rule's application from boundaries between sites held in common ownership.
3. To remove the rule that seeks to prevent car parking in front yards in the Isle Street subzone.
4. Any such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.

I wish to be heard in support of my submission and would consider presenting a joint case with other submitters.



(Signature of person authorised to sign on behalf of submitter)

10 October 2014
(Date)

Address for service of submitter:

C Hockey
C/- John Edmonds and Associates Limited
PO Box 95
Queenstown

Telephone: 03-450-0009

Email: john@jea.co.nz
Contact person: John Edmonds

**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name **HW Holdings NZ Limited**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. HW Holdings NZ Ltd (HW) could not gain an advantage in trade competition through this submission.

1. The specific provisions of the proposal that HW's submission relates to are:

1.1 The Plan Change in its entirety.

2. HW's submission is:

2.1 HW supports the plan change, including the need to identify additional town centre zoned land, subject to the relief set out in this submission

2.2 HW owns 9 contiguous titles of land located to the west of the Lakeview camp ground. This block of land comprises a total of 4,530m²; creating an almost rectangular block of land that generally measures 50m x 80m. This land all has frontage to Thomson Street. There are three adjacent separately owned titles (1,542m²) that complete this block through as far as Glasgow Street.

2.3 All of this land, including the three adjacent titles, are slightly elevated above Thompson Street, at the same contour level as the Lakeview campground to the east, and enjoys the same expansive views to the south over the top of the St. Moritz, Peppers Beacon, and Rydges Hotels to Lake Wakatipu and the mountains beyond.



Figure 1 – Location of Submitters land

- 2.4 These sites all climb steeply at their rear or northern boundaries to the adjoining Council owned block of land that is referred to as the 'Lynch block'.
- 2.5 The submitters land is vacant, having been cleared of all buildings by the previous owner, in anticipation of a previously approved hotel development.
- 2.6 All of this land (including the three adjoining titles) is otherwise included in sub-zone A of the High Density Residential zone.
- 2.7 The submitter supports the inclusion of the land within the Town Centre zone; however there are concerns that the land may be significantly impacted upon by the way in which development occurs on the Council's adjacent Lakeview land.
- 2.8 The Lakeview Sub-Zone is based upon a Structure Plan (Figures 2 and 3 of the Proposed Plan Change provisions), which include an indicative roading layout and a series of viewshafts.
- 2.9 The roading layout indicates that a new road will enter the Lakeview Sub-Zone off Man Street and terminate in a 'market square' area.
- 2.10 It is understood that the proposed convention centre might be located around the western edge of that 'market square' and that a range of other residential, visitor accommodation, retail and tourism activities will also face on to that public space (ie. proposed 'active frontage' rule); resulting in a shared-space plaza. Development within this area will all tend to be focused to the north and east. This is the area where the 'active frontage' rule applies.

- 2.11 The Structure Plan layout uses the existing topography to define the space, with the more elevated 'Lynch block' creating the western edge, and the hill-slope of Bob's Peak creating the northern edge.
- 2.12 The viewshafts are shown on the Structure Plan generally running from north to south. It is assumed that the intention of these is to create view-lines for people within the plaza area. Typically they are included within a plan to ensure that a particular view or aspect is protected, or more generally to create a form of visual relief within a development.
- 2.13 By their very nature, viewshafts tend to be unobstructed by buildings and contain only low growing landscaping. They tend to also provide an access function. It is noted that there are no policies or associated methods that provide any certainty as to how these viewshafts shall be developed and maintained.
- 2.14 In this case the viewshaft that runs alongside the western edge of the proposed 'reserve' makes some sense as it is understood that this land might be used for a future hot pool facility, and this viewshaft starts somewhere within the 'market square' area.
- 2.15 A further 'secondary' view-shaft extends in between the submitters eastern boundary and the Council owned Lakeview site. The purpose of this view-shaft is less clear, as its start point is at the western-most edge of the Lakeview sub-zone, somewhere at the toe of the Lynch block hillside. This view-shaft does not appear to serve any particular view function.

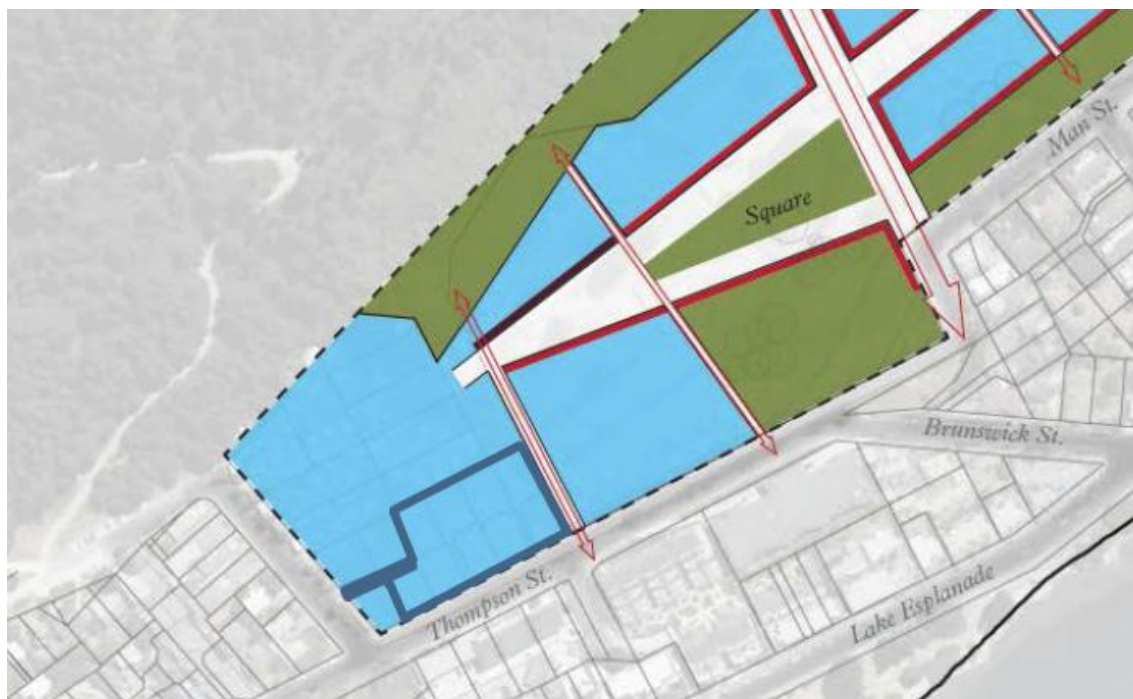


Figure 2 – Submitters land relative to proposed secondary view-shaft

- 2.16 The submitter is very concerned that this secondary view-shaft adjacent to the eastern boundary of their land will in fact become a service lane; used as the back-of-house area for the convention centre for location of skip bins, deliveries, and other low amenity aspects.
- 2.17 If a convention centre is not built in this location, the risk remains that any alternative use of this land would also be driven by the Structure Plan to establish with the higher amenity 'front-door' components generally facing towards this plaza area, while the lower amenity servicing aspects of a development would occur from the western side; from the 'view-shaft'.
- 2.18 The submitters land is at the same elevation at the adjoining Lakeview land and would be significantly impacted upon if the eastern edge of that land is used for service activities, and further if any development occurs on that adjoining land where back-of-house activities are located, as they would be highly visible in direct line-of-sight.
- 2.19 The proposed zone provisions identify a convention centre as requiring a Controlled Activity (non-notified) resource consent approval anywhere within the Lakeview sub-zone.
- 2.20 It is understood that the convention centre would have a footprint of approximately 7,500m², and such a building would typically have large expanses of continuous wall, particularly along the less public edges or facades.
- 2.21 The submitter considers that the resource consent status of building a convention centre on the adjoining land should involve a higher category of at least Restricted Discretionary, so that design matters can be more adequately assessed, and affected parties can be involved in decision-making.
- 2.22 The submitter also considers that any services area such as loading docks, rubbish store and similar low amenity spaces should be prevented from locating adjacent to any part of the common boundary of the submitter's land.
- 2.23 Whilst the submitter acknowledges the positive benefits that might result from the associated open space created by a viewshaft parallel to its eastern boundary, it seeks appropriate methods to ensure that the viewshaft where it is adjacent to the submitter's land is not used for vehicle access purposes, and is only used for landscaping and pedestrian/ cycle purposes.
- 2.24 Proposed Rule 10.6.5.1 (xiii) requires that development within the Lakeview Sub-Zone occurs in accordance with the Structure Plan, with provision for a 5m variance. The submitter seeks amendments to this rule to ensure that the viewshaft is not able to be varied so that it might be located within the submitter's land.

3.0 I seek the following decision from the local authority:

That the Plan change provisions (including objectives, policies and methods) be amended so that:

- *Any building or development within the adjoining Lakeview Sub-Zone involves a Restricted Discretionary consent process (rather than Controlled Activity).*
- *The viewshaft that runs parallel to the submitters land be limited to use for landscaping, pedestrian/ cycle purposes only - at least where that viewshaft is adjacent to the submitters property boundary.*
- *The viewshaft not be used for vehicle access purposes, at least over that part of the viewshaft that is adjacent to the submitter's property boundary.*
- *That Rule 10.6.5.1 (xiii) be amended so that the secondary viewshaft adjacent to the submitters land cannot be located within the submitter's land.*
- *Matters of Discretion and associated Assessment Matters be included to ensure that any development of land within the Lakeview Sub Zone to the east of the submitters land be managed so that there are no service or back-of-house facilities located adjacent to the common boundary of the submitters land.*
- *The submitter seeks such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.*

4.0 I wish to be heard in support of my submission.

5.0 I would consider presenting a joint submission



John Edmonds

(Signature of person authorised to sign on behalf of submitter)

10 October 2014

Address for service of submitter:

HW Holdings Limited
C/- John Edmonds and Associates Limited
PO Box 95
Queenstown

Telephone: 03-450-0009
Email: john@jea.co.nz
Contact person: John Edmonds

**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **Queenstown Gold Ltd**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. Queenstown Gold Ltd (Queenstown Gold) could not gain an advantage in trade competition through this submission.

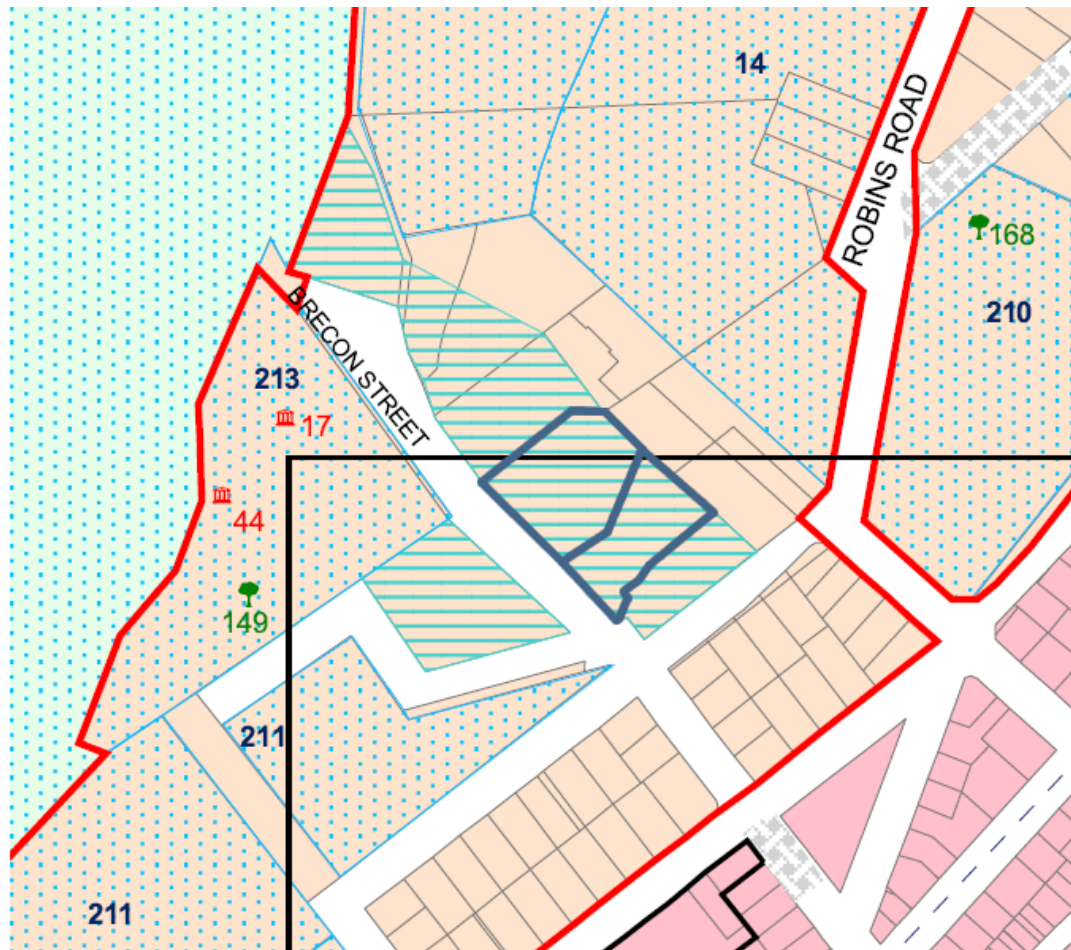
1. The specific provisions of the proposal that Queenstown Gold's submission relates to are:

1.1 The Plan Change in its entirety.

2. Queenstown Gold's submission is:

2.1 Queenstown Gold supports the plan change, subject to the relief set out in this submission.

2.2 Queenstown Gold owns two contiguous parcels of land, Lot 1 DP306661 and Lot 2 DP27703, on the eastern side of upper Brecon Street comprising 5,713m². The map below shows the location of the sites, bordered in blue.




- 2.4 Lot 1 (2,428m²) is currently largely vacant, with a current use of a small bicycle sales and service office, with associated jump park. The larger Lot 2(3,285m²) is currently used for an indoor mini golf activity, within a 1,300m² building. This building was previously used for the Queenstown Car Museum.
- 2.5 Both blocks are bound by Brecon Street to the west, with a Council Local Purpose Reserve, the Aurora Energy Substation and the New Zealand Fire Service (Queenstown Fire Station) to the north and east. Adjoining the southern boundary is the complex of buildings containing the Queenstown Medical Centre.
- 2.6 The current zoning of land in this upper Brecon Street area is Sub-Zone A of the High Density Residential zone, with a 'commercial precinct' overlay. The overlay includes the submitter's land, the Medical Centre and the outdoor mini golf land on the opposite side of Brecon Street. The commercial precinct overlay enables 'Commercial Recreation Activities, Community Activities, Health Care Facilities, and Retail Sales ancillary to any Commercial Recreation Activity, Community Activity or Health Care Facility'. In addition, there are several rules in the Plan relating to the submitter's site, generally enabling efficient development of the site and non-residential activities on the site.

- 2.7 Plan Change 50 proposes that the 3,909m² parcel of land on the western side of Brecon Street (being on the opposite side of the road from the submitter's land), comprising the outdoor mini-golf activity, be incorporated in the Town Centre Zone. However, it does not propose any change to the balance of the 'commercial precinct' on Brecon Street currently shown in the District Plan, including the submitter's land.
- 2.8 Queenstown Gold Ltd submits that the decision not to rezone the 'commercial precinct' of the High Density Zone on Brecon Street in its entirety to Town Centre Zone is anomalous. It is considered that if there is an accepted need to expand the Town Centre Zone, an objective analysis would identify this area as a logical extension of the Town Centre Zone. Some reasons for this view are outlined below.
- 2.9 The 'Commercial Precinct' of the High Density Residential Zone on Brecon Street is a mix of developed non-residential properties, community and commercial recreation activities and underutilised sites. There is no residential activity occurring on any of the land within this 'Commercial Precinct'. Rezoning the land to Town Centre Zone would not result in a significant change in character to enable a broader range of commercial activities in this area in accordance with the Town Centre Zone. Allowing more efficient use of these sites in accordance with the rules of the Town Centre Zone would incentivise the redevelopment of sites in this area and generally improve the visual amenity of that neighbourhood.
- 2.10 The 'Commercial Precinct' of the High Density Residential Zone on Brecon Street is ideally located for Town Centre Zoning, being close to transport routes and public car parking and being situated on an existing thoroughfare between the town centre as it is currently zoned and the Skyline Gondola, a route which already receives considerable foot traffic. Importantly, it is noted that this area was identified as appropriate to consider for expansion of the Town Centre Zone in the 2009 Queenstown Town Centre Strategy and the 2012 District Plan review consultation material. Both of these documents were subject to public consultation.
- 2.11 It is submitted that an expansion of the Town Centre Zone in this area is more rational than most of the expansions of that Zone proposed under Plan Change 50. For this reason, it is considered that this area should be rezoned Town Centre Zone in addition or instead of the Lake View area and those parts of the Isle Street block to the east of Brecon Street.

I seek the following decision from the local authority:

1. That the area on Brecon Street currently zoned High Density Residential with a 'Commercial Precinct' overlay be rezoned to Town Centre Zone.
2. Any such other related or consequential relief that may be deemed appropriate to address the matters raised in this submission.

I wish to be heard in support of my submission and would consider presenting a joint case with other submitters.



(Signature of person authorised to sign on behalf of submitter)

10 October 2014
(Date)

Address for service of submitter:

Queenstown Gold Ltd
C/- John Edmonds and Associates Limited
PO Box 95
Queenstown

Telephone: 03-450-0009
Email: john@jea.co.nz
Contact person: John Edmonds

**Submission on Plan Change 50 to the Queenstown–Lakes District Plan
Clause 6 of Schedule 1, Resource Management Act 1991**

To **Queenstown-Lakes District Council**

Name: **Memorial Property Ltd**

This is a submission to Plan Change 50 to the Queenstown-Lakes District Plan. Memorial Property Ltd could not gain an advantage in trade competition through this submission.

1. The specific provisions of the proposal that Memorial Property Ltd's submission relates to are:

1.1 The Plan Change in its entirety.

2 Memorial Property Ltd's submission

2.1 Memorial Property Ltd and its personnel have a longstanding interest in the Queenstown Town Centre as local residents, members of the business community and investors in various properties and businesses. This submission relates to the submitter's concern as to how Plan Change 50 may affect how Queenstown develops in the future.

2.2 Memorial Property Ltd supports the better utilisation of Council's landholdings in the Lakeview area through enabling more development and rationalising reserve holdings. It also supports generally the idea of a Convention Centre within the Lake View area. However, Memorial Property Ltd is concerned about the nature and scale of development proposed by Plan Change 50 and whether infrastructure could and should be provided to support the proposed developed.

2.3 Memorial Property Ltd agrees with the importance attributed to the Queenstown Town Centre in the analysis that supports Plan Change 50, and considers that the Queenstown Town Centre contributes significantly to the social and economic wellbeing of the residents of the Wakatipu and the experiences of visitors to Queenstown. However, Memorial Property Ltd is concerned that the plan change as currently proposed could undermine the vitality of the existing town centre and detract from those values it aims to enhance.

2.4 Memorial Property Ltd has reservations about the overall rationale of Plan Change 50, noting that it represents a significant departure from the policy framework established in the current District Plan and the preferred direction promoted by Council in its consultation and strategy development in recent years. That policy

direction seeks, amongst other matters, to contain the spatial extent of the town centre. Memorial Property Ltd support that current policy direction and are concerned, for example, by the following proposed amendment to the Town Centre Zone which would appear to signal a change in policy:

The sense of arrival is to be achieved ~~through careful containment of the town centres within defined limits and~~ by encouraging a built form which announces arrival at its outer limits. Appropriate containment of town centre ~~Such a built form, and its containment~~ will assist in reducing the impacts of the town centres on adjacent living areas.

- 2.5 Council has in recent years consulted on limited extensions of the Town Centre Zone, in what have been considered at that time to be logical directions. Memorial Property Ltd is not necessarily opposed to extensions of the town centre of a reasonable nature and scale. It is submitted that the alternative options as promoted in the 2009 Queenstown Town Centre Strategy and the 2012 consultation on the proposed District Plan review were in keeping with this broader strategy, and that those options should be analysed as part of this plan change process. These corridors are considered to present more rational extensions of the town centre, being of an appropriate scale and in keeping with the 'natural' direction of commercial expansion and topographical boundaries.
- 2.6 Memorial Property Ltd does not consider that Plan Change 50 is based on a convincing analysis of the current and future strategic role of the Queenstown Town Centre. It is submitted that the town centre, by in large, coexists with other commercial centres such as those in Frankton in a complementary rather than competing manner, and that this is likely to continue to be the case if the planning controls in and around the town centre remain similar. By Plan Change 50 framing this issue in a different manner, Memorial Property Ltd is concerned that the risks that the existing town centre faces are being misunderstood. It is the submitter's view that a sudden significant expansion of the town centre as proposed in Plan Change 50 risks undermining rather than supporting the Queenstown Town Centre.
- 2.7 Memorial Property Ltd is concerned that the Plan Change fails to adequately assess and address potential adverse effects. The submitter has concerns around assumptions that the current transportation network will be little changed, when significant adverse effects under the 'status quo' are identified. It is considered that Plan Change 50 could significantly compound those adverse traffic effects. It also appears that Plan Change 50 lacks a strategy for dealing with car parking and that the road network in and around the site may prove inadequate to cater for the levels of development enabled.
- 2.8 Memorial Property Ltd questions aspects of the evidence base relied on in Plan Change 50. The submitter is concerned about some of the assumptions that have been used for modelling, particularly traffic modelling. It considers that the land use activities enabled by the zoning could differ significantly from what was assumed in that modelling and, as a result, that substantially greater traffic generation could

arise than has been assumed. Another example is from the supporting report by McDermott Miller. The submitter considers that that report substantially underestimates the amount of unutilised commercial development capacity in the Queenstown Town Centre. Further, it is not always possible through reading the plan change documentation to analyse the evidence base relied upon. Some assumptions are not made clear (for example the land uses that make up the 'status quo' scenario for traffic modelling).

- 2.9 Memorial Property Ltd is concerned that the proposed building heights in the Plan Change 50 area could detract from the visual amenity and landscape qualities of Queenstown and its surrounds. Certainly, in the opinion of the submitter, the images included in the plan change and publicised in local media do not provide confidence that the proposed building heights are appropriate.
- 2.10 Memorial Property Ltd considers that much of the proposed extension of the town centre is not a natural addition to the town centre, being significantly separated by distance, elevation changes and street layouts. There is considered to be a risk of a competing rather than complementary retail and office precinct emerging, which could undermine the vitality of the existing town centre. A fragmented, sprawling commercial area could emerge which lacks the walkable appeal of the current town centre.
- 2.11 Memorial Property Ltd is concerned that both public and private investment could be diverted away from the existing town centre as a result of Plan Change 50. Plan Change 50 could result in lower standards of buildings in the town centre as opportunities to redevelop existing sites are not pursued. Older buildings can present a dilapidated appearance and can be less safe and suitable for the needs of occupants. And public sector investment could be spent on street and public space improvements and on infrastructure in the proposed new areas of town centre, rather than on improvements to the existing town centre.
- 2.12 Memorial Property Ltd has concerns that Plan Change 50 enables via a controlled activity the development of a Convention Centre. In principle, Memorial Property Ltd supports the development of a convention centre near the Queenstown Town Centre. The submitter also agrees that the wider Lake View area is likely to contain a suitable site for such a facility. However, the effects of the specific location and design of a convention centre could be significant. It is submitted that it would be normal for a proposal of this scale to be subject to a comparison of alternative sites via the rigour of an RMA assessment. This would not be the case if the plan change proceeded as proposed. Several sites within the proposed Lake View subzone are distant from the town centre, being beyond the convenient walking distance of conference attendees to the existing town centre. This may reduce the benefits of this public investment for those that are being asked to make a substantial financial contribution to the project via Council rates. It is submitted that this plan change is the correct forum to settle on an appropriate location for the conference centre, or else the proposed zoning should enable alternative sites to be considered through a public process in the future.

- 2.13 If the plan change is to identify a preferred site for a conference centre, as argued should occur above, it is submitted that the appropriate location would be in the general location marked within the red box in the image below. This location enjoys substantial views, is a large flat site and is within a close walking distance of the existing town centre:

Figure 2 Lakeview sub-zone Structure Plan



- 2.14 Given the issues raised above, Memorial Property Ltd doubts that Town Centre zoning is the most appropriate zoning for the Lake View area. Alternative zonings that more precisely control the range of activities enabled are likely to be more appropriate. This may for example be achieved with a subzone of the High Density Residential Zone (which is in fact the current zoning of the area) and if necessary the use in specific areas of other zones and overlays already used in the Plan.
- 2.15 Further, Memorial Property Ltd considers that the extent of the proposed Isle Street subzone and the development allowed therein needs to be rationalised. It is questioned whether that area has the appropriate attributes to convert to a town centre area. Certainly, the proposed height limits for this subzone appear inappropriate for this area. The submitter considers that subzone should either be deleted or the area which it covers should be significantly reduced, to align with the extent contemplated in 2009 Queenstown Town Centre Strategy and the 2012 consultation document regarding the District Plan review.

2.16 These suggested amendments would better serve the needs of the Queenstown community in the future, and better achieve the purpose of the Resource Management Act.

I seek the following decision from the local authority:

Either

- decline the plan change in its entirety;

or:

- amend the plan change to apply a zoning regime to the Lake View area which enables the following activities only:
 - o visitor accommodation
 - o residential activity
 - o conference facilities
 - o tourism facilities
 - o activities ancillary to those listed above
- reduce the height limits enabled to align with other comparable zonings of the operative Queenstown Lakes District Plan;
- either identify within the District Plan an adequately sized public car parking area(s) or apply more rigorous on-site car parking standards;
- make amendments to ensure that the internal roading network can safely and efficiently cater for the proposed land uses;
- delete or reduce in size of the proposed Isle Street subzone;
- either
 - o limit the location allowed via a controlled activity for a convention centre to the site shown in the attached annotated Structure Plan;
- or
 - o Raise the activity status of a convention centre to restricted discretionary, with a matter of discretion listed as:

'the suitability of the proposed location'

with associated assessment matters included to address, amongst other matters, the consideration of the benefits that may be afforded to the existing town centre as a result of factors such as the walking distance for conference delegates to the existing town centre.

- Any other related or consequential relief that may address the issues raised in this submission

I wish to be heard in support of my submission and would consider presenting a joint case with other submitters.



(Signature of person authorised to sign on behalf of submitter)

10 October 2014

(Date)

Address for service of submitter:

Memorial Property Ltd
C/- John Edmonds and Associates Limited
PO Box 95
Queenstown

Telephone:	03-450-0009
Email:	dan@jea.co.nz
Contact person:	Dan Wells



FORM 5: SUBMISSION ON A PUBLICLY NOTIFIED PLAN CHANGE

Clause 6 of First Schedule, Resource Management Act 1991 – as amended 30 August 2010

TO // Queenstown Lakes District Council

YOUR DETAILS // Our preferred methods of corresponding with you are by **email** and **phone**

Name: _____

Phone Numbers: Work _____ Home _____ Mobile _____

Email Address: _____

Postal Address: _____ Post Code: _____

PLAN CHANGE to which this submission relates to:

I **COULD/ COULD NOT** gain an advantage in trade competition through this submission.

I AM/ AM NOT* directly affected by an effect of the subject matter of the submission:
 (a) adversely affects the environment; and
 (b) does not relate to trade competition or the effects of trade competition.

** Delete entire paragraph if you could not gain an advantage in trade competition through this submission.*

*** Select one.*

SPECIFIC PROVISIONS of the proposal that my submission relates to are:



QUEENSTOWN
LAKES DISTRICT
COUNCIL

Queenstown Lakes District Council
Private Bag 50072, Queenstown 9348
Gorge Road, Queenstown 9300

P: 441 0499
E: pcsubmission@qldc.govt.nz
www.qldc.govt.nz

My submission is: (include whether you support or oppose the specific provisions or wish to have them amended; and the reasons for your views)

I seek the following from the local authority (give precise details)

I DO / DO NOT wish to be heard in support of my submission.

I WILL / WILL NOT consider presenting a joint case with others presenting similar submissions.

Signature – (to be signed for or on behalf of submitter) **

Date

*** if this form is being completed on-line you may not be able, or required, to sign this form*



Queenstown Lakes District Council
Private Bag 50072, Queenstown 9348
Gorge Road, Queenstown 9300

P: 441 0499
E: pcsubmission@qldc.govt.nz
www.qldc.govt.nz

1. SPECIFIC PROVISIONS of the proposal that my submission relates to are:

Section 16.6.5.1 Site Standards.

Lake View

- Max Building Cover 80% **10.6.5.1-i(D)**
- Glasgow St Set Back 4.5 M **10.6.5.1 - iv (d)**
- No residential on ground floor for active fronts **10.6.5.1 - vii (d)**
- No residential on ground floor for active fronts **10.6.5.1 - xi (e)**
- Max Height = as per map **10.6.5.1 - xi (d)**
- *Glasgow St 2.5+25°*
- *Thompson 4.5 = 45°*

Isle St SubZone

- Max Cover 70%
- Max Set Back is 1.5M to Road **10.6.5.1 iv(e)**
- No front yard parking **10.6.5.1 iv(f)**
- Minimum setback to other boundaries is 1.5M **10.6.5.1 iv(g)**
- Max Height = 12M **10.6.5.1 - xi (e)**
- Add 2M for roof form - **xi (f)**
- Sunlight recession 5M+45°

Active Fronts

- 4.5M Above ground level.

My submission is: (include whether you support or oppose the specific provisions or wish to have them amended; and the reasons for your views)

1. I wish to have the provisions amended to allow for more intensive development on the proposed Lake View Subzone and Isle St Subzone. Queenstown urban fabric is a significant contribution to the success of Queenstown as a tourist destination.
2. Further densification of the Queenstown Center and Surrounds will make for a more vibrant built environment.
3. Queenstown is a fast growing region. You only need to look at the development in the past 15 years to see the impact of sprawling residential development. Allowing for intensive development within and surrounding the existing town center allows for development that does not require further subdivision of our open space. High density is a more sustainable development as it allows to leverage of existing infrastructure. Walkable city's require less road infrastructure. High quality urban design creates good work and living environments. While the proposed plan change is on the right track, a more intensive development will have further benefits to the urban environment and the economy.
4. I wish to see minimum building cover on both the lake view site and the Isle St Sub zone to be increased to Min of 95%. For the development of these blocks to integrate

into the existing urban fabric it is critical to maintain a consistency of density at ground level.

5. I wish to see all recessions plains rules be removed from the Isle st sub zone. The implication on building form has not been tested and will likely lead to poor building form that are a detriment to the urban form and environment.
6. I wish to see adoption of volumetric design controls instead of maximum height plane controls. Volumetric controls allow for flexibility in building mass. They create the condition where buildings can be taller if they are thinner. The result is that a building form can be adjusted to accommodate the same area of occupation, while creating flexibility within the building lot to adjust for sun light access and view depending on the build form around the site. Volumetric design controls result in building that respond better to neighboring buildings allowing for view and sunlight access. They also result in a modulated skyline, instead of single height block mass.
7. I wish to have the structure plan amended to allow further building on the strip of land marked as reserve on the north. Higher density of building will support the vibrancy of the ground floor. Given the proximity of the massive Ben Lomus reserve adjacent to the site, there is more than adequate provision for open space already.
8. Finally I wish to see this urban space developed, and see my council realise the valued added to the council owned asset.

I seek the following from the local authority (give precise details)

- a) I seek the Local authority to review the structure plan. I have concern that the design of the square bounded by roads will result in poor public space and not meet the policy objectives. I would like to see the active edge requirements be a continuous connection to the existing town center.
- b) I request the local authority to commission a report on the economics of development to ensure the proposed rules do not create a set of conditions that make the proposed plan unfeasible. Specifically at risk is the development of the building that form the Isle St extension. The ground floor retail requirements are for a min 4.5M inter floor height. The max building height allows for only 2 stories above. The height from ground floor to upper level likely require lift access to be attractive for a tenant. The rules impose additional costs of the extra volume on ground floor and the lift. Hence it may be that the proposed change imposes rules that adds cost to the building that means they are simply not feasible and thus will not be realized. This passage is critical to the connections of the urban fabric. The local authority may find that the feasibility of such a development requires a min of 6 stories to cover the increased expense of the lift and ground floor quality.