

30 October 2014

The Chief Executive
Queenstown Lakes District Council
Private Bag 50072
Queenstown 9348

BY HAND

Attention: District Plan Administrator

Dear Sir/ Madam

PLAN CHANGE 50 - FURTHER SUBMISSIONS - MAN STREET PROPERTIES LIMITED, THE DAIRY GUESTHOUSE 2003 LIMITED AND ANY OLD FISH COMPANY HOLDINGS LIMITED.

We confirm that we act for the abovementioned companies in relation to the publicly notified Queenstown Lakes District Council District Plan, Plan Change 50 ("PC50").

Please find **enclosed** the further submissions which were filed by us on the 30th day of October 2014 by way of email on behalf of:

1. Man Street Properties Limited;
2. The Dairy Guesthouse 2003 Limited; and
3. Any Old Fish Company Holdings Limited.

Yours faithfully
GTODD LAW


Graeme Morris Todd / Katharine L Pfeffer
Principal / Solicitor
Email: graeme@gtoddlaw.com
Matter ID: 2635, 2704, 2705

GTODD
30 OCT 2014
QUEENSTOWN

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL
AT QUEENSTOWN**

IN THE MATTER

of the Resource
Management Act 1991

AND

IN THE MATTER

of the Publicly Notified
Plan Change 50

AND

IN THE MATTER

of Submissions by various
parties named herein

**FURTHER SUBMISSIONS IN SUPPORT OF, AND IN OPPOSITION TO,
SUBMISSIONS ON PUBLICLY NOTIFIED PROPOSED PLAN CHANGE 50**

GTODD LAW

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Counsel acting: G M Todd

GTODD law
LAWYERS & NOTARY PUBLIC

QLDC
30 OCT 2014
QUEENSTOWN

To: Queenstown Lakes District Council

MAN STREET PROPERTIES LIMITED;
ANY OLD FISH COMPANY HOLDINGS LIMITED; and
THE DAIRY GUEST HOUSE LIMITED (the **further submitters**).

This is a further submission in support of and in opposition to a submission on Plan Change 50 (see attached schedule for detail) to the Queenstown Lakes District Council District Plan (the **proposal**):

The further submitters are entities who have an interest in the proposal that is greater than the interest the general public has, given that the further submitters own properties within the area the subject of the Plan Change and filed primary submissions to the Plan Change.

They support and oppose the submissions of:
See attached schedule

The particular parts of the submission they support and oppose are:
See attached schedule

The reasons for their support and opposition are:
See attached schedule

They seek that the whole or part of the submission be allowed or disallowed:
See attached schedule

They wish to be heard in support of my further submissions.



Graeme Morris Todd on behalf of :
MAN STREET PROPERTIES LIMITED;
ANY OLD FISH COMPANY HOLDINGS LIMITED; and
THE DAIRY QUEST HOUSE LIMITED

Dated this 30th day of October 2014.

QALDC
30 OCT 2014
QUEENSTOWN

Address for service of persons making further submissions – at the offices of:

GTODD Law
Level 3,
36 Shotover Street
(P O Box 124)
Queenstown

Telephone: 03 441 2743
Fax: 03 441 2976
Email: graeme@gtoddlaw.com

Contact person: Graeme Todd

QLDC
30 OCT 2014
QUEENSTOWN

FURTHER SUBMISSIONS IN SUPPORT OF AND IN OPPOSITION TO SUBMISSIONS ON PUBLICLY NOTIFIED PROPOSED PLAN CHANGE 50 - SCHEDULE

Submission No	Submitter	Submission content supported or opposed	Support	Oppose	Reason for Support of Opposition
50/10	Brecon Street Partnership Limited	Seeks to maximise density where possible. Supported in that PC50 broadly provides for strategic development of Queenstown as the centre of the District. However, PC50 is conservative	✓ in part		For reasons outlined in primary submissions. Supports Queenstown should be the commercial centre of the District
50/12	Alan Bunting	Relates to Isle Street sub-zone. Objects to proposed height limit, site coverage, setback shading, lack of parking provision, potential for noise from bars and restaurants and increase in rates. Seeks 7m height limit, 60% site coverage, on-site car park and that all bars, nightclubs and restaurants be prohibited activities.	✓	✓	For reasons outlined in primary submissions
50/13	Louise Wright	Supports Plan Change 50 with exception to the proposed site standards	✓		For reasons set out in primary submissions
50/16	Maximum Mojo Holdings Limited	Supports PC50 on condition that Isle Street sub-zone is confirmed and that the Isle Street sub-zone is subjected to the same level of rigorous planning and urban design analysis undertaken for the Lakeview sub-zone. Agrees expansion of the CBD is required and believes that this will enhance the economy and social well-being of the CBD and wider area, and will retain businesses rather than seeing them relocate to Frankton.	✓		For reasons set out in primary submissions
50/14	Alan and Marie Brown	Strongly opposes the proposed height limits on Man Street		✓	For the reasons set out in primary submissions
50/29	Doug and Betty Brown	Visual impacts – height/bulk and scale of potential development given the proposed provision could lead to "concrete jungle". There will also be transport and parking issues. Seeks to remove Man and Isle Streets from PC50. Opposes PC50 being an extension of existing CBD		✓	For the reasons set out in primary submissions
50/31	Gillian and Donald McDonald	Objects in particular to proposed heights, site coverage, amalgamation of small sites, car parking provisions and increased rates		✓	For the reasons set out in primary submissions
50/33	Wateright Investment Limited	Considers PC50 a rational extension of the CBD. Has concerns over Isle Street sub-zone rules. In particular, building height limits and the requirement for a recession plane. Seeks the rule relating to the prevention of car parking be removed.	✓		For the reasons set out in primary submissions
50/36	G Hockey	Supports PC50 in that it is rational expansion of the Town Centre. Has concerns with Isle Street sub-zone rules. In particular, building height controls and the need for a recession plane.	✓		For the reasons set out in primary submissions
50/39	Memorial Property Limited	Concerned about the nature and scale of development proposed by PC50 and whether infrastructure should be provided. Has concerns about overall rationale of PC50. Alternative option should be analysed that are more in keeping with the natural direction of commercial expansion and topographical boundaries. Sudden significant expansion will undermine rather than support the existing CBD. Potential adverse effects have not been adequately addressed. Traffic effects will be significantly compounded, and PC50 lacks an overall car parking strategy. Public and Private investment could be diverted away from the existing CBD. Alternative sites should be assessed for the convention centre. Lakeview sub-zone should remain as HDR zone.		✓	For the reasons set out in primary submissions
50/40	Justin Wright	Seek amendments to the provisions of Lakeview on Isle Street sub-zone to allow for more intensive development. Seeks volumetric design controls which will result in better built form outcomes.	✓		For the reasons set out in primary submissions

Submission No	Submitter	Submission content supported or opposed	Support	Oppose	Reason for Support of Opposition
50/24	John Thompson	a) Increase site coverage in the Isle Street sub-zone to 80% and any consequential change b) The proposed requirement for acoustic insulation for residential and visitor accommodation activated in the Isle Street sub-zone (10.6.5.1.v11e and 10.6.5.1.xvi). c) The different treatment for noise associated with premises licenced for the sale of liquor (10.6.5.1.xv) d) The different rules relating to recession planes in the Isle Street sub-zone proposed e) Delete the requirement for frontage onto Isle and Man Streets for sites in excess of 2000 m2 in order to qualify for a height limit of 15.5m. f) Proposal to delete the standard that means maximum retail space in excess of 400 m2 becomes a non-complying activity g) The benefits and costs of the effects of the provisions referred to in the Isle Street sub-zone have not been properly assessed or quantified in accordance with section 32 nor have they been assessed with regards to their suitability for giving effect to the relevant policies.	✓ ✓ ✓ ✓ ✓ ✓		For the reasons set out in primary submissions
50/18 3 4 6 12 13 14 15 19	Marjory Jane Pack and John Allen	That Policy 2.1 be retained as notified That Policy 3.2 be retained as notified The introduction of new objective 4 and policies 4.1 and 4.4 The introduction of Proposed Policy 4.2, 4.3 and 4.5 Support of site standards 10.6.5 Amendment to site standards 10.6.5.(iv) Retain site standards 10.6.5 (vii) Proposed Amendments to site standard 10.6.5 (xi) Proposed Amendment to zone standard 10.6.5.2 (iv)	✓ ✓ ✓ ✓ ✓	✓ ✓ ✓ ✓ ✓	For the reasons set out in primary submissions For the reasons set out in primary submissions The amendment sought is not necessary For the reasons set out in primary submissions For the reasons set out in primary submissions For the reasons set out in primary submissions For the reasons set out in primary submissions For the reasons set out in primary submissions For the reasons set out in primary submissions
50.03 2.1 3.4 & 3.5 4.1	Reid Investment Trust	Delete reference to Town Centre Transition sub-zone (TCTSZ) That PC50 renders TCTSZ meaningless and the provisions relating to such should be removed Deletion of certain rules, standards, assessments matters and references to the TCTSZ from the District Plan	✓ ✓ ✓		For the reasons set out in primary submissions For the reasons set out in primary submissions For the reasons set out in primary submissions

Dated: 30 October 2014

QUEENSTOWN

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