

## Attachment A: Te Pūtahi Ladies Mile Masterplan - feedback received via email

### Ladies Mile Masterplan Feedback

I oppose this masterplan. These are the reasons why:

1. The whole positioning from Council from start of this consultation to now has been delivered very much within the context that this masterplan in some form is *going* to happen and for that reason, at no time has this been an equitable nor fair process

My rationale for that perspective is as follows:

- The investment that has been placed into this project. It would have cost QLDC (the rate-payers) millions of dollars to get to this stage through consultancy and associated 'experts' spending their time on developing these plans. The council is hardly going to walk away from this project now.
- QLDC itself (if not yet the councilors) are clearly advocating for this project regardless of the impacts. Tony Avery was harking on about it in the Mountain Scene only last week
- The plan has a brand name foisted upon us. Te Putahi – by providing this plan an identity, it becomes more than a concept.
- I've had the sense all the way through this process that QLDC is merely boxing ticking via its engagements with the residents. There's not been any sincerity in the delivery of truly wanting to understand what impact this masterplan could have on the communities.
- It's interesting that one of the largest construction companies in town (Naylor Love) already has an employee working on this project. If this project *was* at risk those commercial wheels would not be turning.
- The plan has been written very much with the potential positives in mind – no negatives have been considered.

2. I have serious concerns over the detail of the plan, namely;

- The poor residents of Sylvan Avenue who are suddenly going to have a new road placed upon them with regular busses, cars and noise impacts in what is currently an enjoyable green space. They will lose privacy. We will lose the soft tree landscape. etc
- I have significant concerns at the Lower Shotover Road end of the development, we will eventually begin to see development creep down Lower Shotover Road into Dalefield. It won't be zoned for development, but neither was Ladies Mile. WHERE DOES IT STOP!
- The previously named 'Laurel Hills' development that was shelved is clearly now given the tacit go ahead, completely ignoring the challenges and impacts of development in this parcel of land.
- The fact that this plan will facilitate high density housing. We are told the density level is needed to support the proposed transport infrastructure. But if we didn't have that many people planned to live there, we wouldn't need the increase in transport provision. It's almost as if the planners are trying to come up with solutions to problems that they have caused.

Having 4, 5, 6 story blocks next to or adjacent to Slope Hill is simply outrageous.

- The impact this plan will have on people's existing homes and also livelihoods such as the Pet Lodge seem to hold no sway at all.
3. I have serious concerns over the concept and strategic positioning of this plan.
- The risk of clogging Queenstown's traffic is incredibly real. NZTA provided the advice that 1,000 residences was the maximum that the road could handle. This has been ignored.

- The planning team have offered spurious explanations about the impact of traffic but ultimately have simply not been able to adequately answer how traffic congestion will be handled – aside from suggesting it is part of a bigger issue and thereby trying to deflect the reality that no matter how much public transport you have available, Kiwi's are wedded to their cars and if you flood this area with more residences you are creating a very, very big mess
- The traffic presentations at the information evenings have been atrociously poor. The traffic specialist (Colin ?) for the last meeting at Shotover School could only tell us how little time he had to present and was an incredibly weak link in being able to satisfy concerns. There was no concrete information to back up his perspectives aside from some vague reference to traffic modelling. For the most important issue of this development and to simply refer to his self-proclaimed global experience was laughable. We want and need facts around traffic impact and what NZTA have to say. This could not be delivered.
- I congratulate the council in trying to attain a 40-60% modal shift away from car usage BUT Ladies Mile is not the place to use as an excuse to start to make this happen. Start in Frankton and work out.

Queenstown is not a city. It is not as simple as putting on busses and expecting residents to use them. Or having a local takeaway and expecting people won't then use their cars.

If you live in a city, you normally have multiple means of public transport. Train, tram, public bus, cycleways. People who live in this development will still need and want to use cars because they will need to and want to get to places beyond just the Wakatipu basin. What real study has gone into how people use their vehicles and why? This plan has not satisfactorily answered those questions and has been

conveniently been smudged into a wider Queenstown traffic issue.

- This whole development is predicated on the QLDC panicking that another area will be developed without their control. Trying to deliver high density housing and a town centre is complete overkill. I understand that not all landowners are intending or wanting to develop their land at all. But if there were some landowners wanting to deliver low density, low impact development in this area, then that would be a lot better than forcing tower blocks and urban infrastructure on a community that simply doesn't want it.
- Why does this land even need to be considered for development? Okay it is flat, but there are so many other areas that could be focused on and fast-tracked. What about the Council takes an even braver decision and zones this land out of the reach of developers and so we can preserve that rural aspect that everyone enjoys when driving into Queenstown.

Ultimately, this masterplan creates and compounds issue around;

1. Horrendous visual pollution – killing the goose that lays the golden egg
2. Major traffic congestion with no strong answers
3. Urban creep...where does it stop?
4. Serving the needs of developers and not listening to the community

The masterplan does not solve any of these issues and should not be accept by councillors.

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**From:** Wayne Stiven [REDACTED]  
**Sent:** Saturday, May 15, 2021 12:42:40 PM  
**To:** Liz Simpson [REDACTED]  
**Subject:** Ladies Mile Master plan Feedback

Hi Liz,

I could not work out how to register to give feedback as it took me straight to a login screen, so here is my feedback on the proposed master plan for Ladies Mile.

### 1. Assumptions

I think there is a fatal flaw with the core assumptions that are driving this master plan. The assumption that stacking in high density will not result in traffic grid lock is just nonsensical. The assumptions that a large proportion of residents will live and work in the subdivision and not need to travel over the bridge is just crazy, I note that the NZTA's submission says the same thing. This flawed assumption seems to be the main driver for the high density areas on the premise that you can jam 100's more dwellings in and it won't make any difference because these people will not need to travel or have cars. If this is allowed to proceed the council, planners, and consultants will have what amounts to one of the worst planning outcomes on their CV's going forward.

### 2. How's it going to work

With the area in question made up of approx 20 landowners is another fatal flaw, my understanding is the council have no idea how its going to work trying to wrangle 20 different landowners there will be winners and losers in terms of how the land is developed, how is that equalised? is it just bad luck is one owners property is to be a sports field and another is high density, until there is an agreement on how this works there is no way this master plan can be allowed to proceed.

### 3. Transport and Traffic

As mentioned in the assumptions, the utopian idea that somehow the residents won't need cars or travel is just crazy, there is no way this master plan can proceed until there is a viable transport solution, having residents e-scooting and biking or waiting for a bus in -10 degrees in winter is another fatal flaw.

### 4. Laurel Hills High Density

Laurel Hills has already been consented under the current district plan utlising a to be built access road halfway up the Stalker road hill, a number of residents have pointed out to the council planners that this is a very dangerous location to have cars pulling into and out of, alas that was not considered with the granting of the consent. I note in the prosed master plan that the Laurel Hills areas is proposed to be high density, which means many more cars than modelled for the current consent can be built. This is another fatal flaw, and another contributor to a grid lock outcome for a road (stalker road) that is already over capacity at peak times.

It seems that the developer and council have granted consent for a medium density

subdivision with the road access granted on a modelled basis of a number of movements, now that access is granted the actual number of movements will be multiples of the initial model which will become a unsafe and congested road.

#### 5. What would I do

The first thing Council need to do is completely bin this master plan, its so out of touch and smacks of idealism, this sort of plan may be ideal in a city, but this is a suburb so needs to be treated as such.

I would leave the current district planning rules in place and leave this area to be developed as a low/medium density suburb with some good public transport options. with the number of landowners involved this is the only way if can work.

I think the consultants involved in this master plan should be removed immediately as they have got it so wrong they will not be able to get it right.

I just hope that the council will listen to the overwhelming feedback that this proposed masterplan need to start again or be completely overhauled as it is so wrong on so many levels.

Regards

Wayne

**Arrowtown Village Association**  
**Submission to Ladies Mile Development Proposal**  
**May 2021**

**Introduction**

The Arrowtown Village Association (AVA) is a volunteer-run incorporated society that works in an energetic, co-operative and organised way for the benefit of the village of Arrowtown. The AVA is a recognised community association by the Queenstown Lakes District Council and is the appointed guardian of the *Shaping Our Future Arrowtown (SOF) 2017 Report*. SOF is the most recent visioning document for the future in Arrowtown compiled following intensive community consultation.

Arrowtown Village Association wishes to provide the following feedback on the Ladies Mile Masterplan.

We take an opposing stance to the Te Putahi Ladies Mile Masterplan due to the proposed rezoning to high density housing.

Our concerns relate to the following:

1. High intensity multi-storey development changing the character of the Whakatipu Basin
2. Potential traffic congestion
3. Parking Issues
4. Potential alternative of intensification in other built-up areas in the Whakatipu Basin
5. Loss of greenspace
6. Other Effects

**1. High intensity multi-storey development changing the character of the Whakatipu Basin**

- a) Potential exists for the Ladies Mile development to become a precedent for other high to medium development areas in the Whakatipu with six to seven storey buildings, inadequate parking, difficult vehicle access, limited green space and the risk of public transport being too infrequent with limited destination options to replace private vehicles

Our view is that a multi-storey high-rise development in Ladies Mile is inappropriate land-use within the given landscape.

**2. Potential Traffic Congestion**

**Our reference point is taken from the SoF (2017) Visioning Report for Arrowtown:**

Community Pillar 6.4 p12

*Recommendation: QLDC/ORC provides a regular, cost effective public transport system that enables **easy access** between Arrowtown and other districts in the region*

- a) Appendix b 2 Transport Strategy in the Masterplan states that only 17% of residents in LHE/SC are tradesmen. This is a group who may well be attracted to living in Ladies Mile

and, unable to utilize public transport, would contribute to traffic congestion particularly in early evening when returning home.

- b) Current Traffic congestion is attributed in part to 34% families dropping their children to school. The plan intends to reduce this stating on p4 that 57% people would be non-car alone travellers ie bus, e bike, walk, still leaving 43% of an increased population using car alone mode. This remains a significant impact on congestion. In our view, not enough effort or thought has been put into public transport solutions to ease the inevitable congestion problems – for example effective bus lanes etc
- c) A second Shotover Bridge has been deemed unnecessary. No matter what plan is accepted, the wider community is still contending with an increased population, and it must be remembered that people will still be commuting from Wanaka, Cromwell and Arrowtown.
- d) It is not readily apparent in the Masterplan how the timing of any infrastructure for traffic management will be put into effect. In our view, any introduction of bus lanes would need to be prior to the onset of the proposed development, and changes to bus scheduling would need to be implemented concurrent with the development since the development itself is likely to cause considerable disruption to traffic.

Our view is that this commuting population will disproportionately suffer from increased commuting times due to the congestion, and that more thought needs to be put into solutions for this interest group.

### **3. Parking Issues**

- a) The Ladies Mile Plan allows for a high-density development of 6 storey buildings with limited provision for parking vehicles. There is an assumption that a small provision of parking spaces will decrease traffic volumes.

Our view is that as well as impacting on Ladies Mile this would create a precedent for other areas in the Whakatipu.

### **4. Potential alternative of intensification in other built-up areas in the Whakatipu Basin and generally setting a precedent for other high- medium density development**

**Our reference point is taken from the SoF (2017) Visioning Report for Arrowtown:**

Heritage appendix 1 p16

*Long term aspirational goal: 2(b) Trees, streetscapes and greenspaces are protected and enhanced to reflect the character of Arrowtown – continually maintaining the heritage of buildings, greenspaces and local environment*

Character appendix 2 p18

*Related Key Issue: The character of Arrowtown is defined by the heritage of the town. The historic part of town has set a template for scale that is a significant contributor to the town's character. Small, simple building forms on large sites. Large, mature trees and green spaces further enhance the low impact the built environment has on the landscape.*



- a) Arrowtowners remain relieved that the Intensification proposed several years ago has been put to rest. Our community values highly the special character we have due to relative low density with reasonable greenspaces. This, with our historic management zone, is a real drawcard for both residents and visitors alike. We wish to express concern should any changes to the Ladies Mile Masterplan result in intensification being considered in our small village, recalling that we were voted NZ's most beautiful small town in 2020.

## 5. Loss of greenspace

- a) From the perspective of residents in the wider Whakatipu, Arrowtown Village Association expresses concern at the continual eroding of greenspace and agricultural land in the Whakatipu Basin. We wonder at what point will there have been enough development in this area, despite it being a sought-after place to live?

Our view is that greenspaces are a key feature of the wider Whakatipu district

## 6. Other Effects

- a) Disposal of Sewerage

We enquire as to the disposal of sewerage. Media reports indicate that the Whakatipu Basin is potentially at maximum level for disposal at the Shotover ponds and excess is already transported to the Awarua site in Central Southland. Our view is that this is an unfair situation which would be further exacerbated by increased housing development.

- b) Impact of COVID on Whakatipu Growth

No consideration seems to have been given to the impact on growth of the pandemic, the slump in tourist numbers and the desire of the Government to ensure that New Zealand does not return to unbridled and uncontrolled growth lead by tourism in the future.

- c) Overall Growth of the Whakatipu

The Masterplan supports the idea that all growth must be accommodated regardless of whether the resulting change in the area's character creates considerable overdevelopment. The masterplan for Ladies Mile on the main entrance to Lake Whakatipu seems to be setting the tone for turning the region into another overdeveloped tourist town that people used to like to visit.

Our view is that the very attraction of living in the Whakatipu is going to be eroded by it becoming a mass of urban sprawl. Where is the plan that shows the roading into and around the region, water supply, sewage systems, electricity supply and environmental crisis management that can cope with the increasing numbers?

Arrowtown Village Association thanks you for the opportunity to provide feedback on this issue.

Kind regards,

Susan Rowley

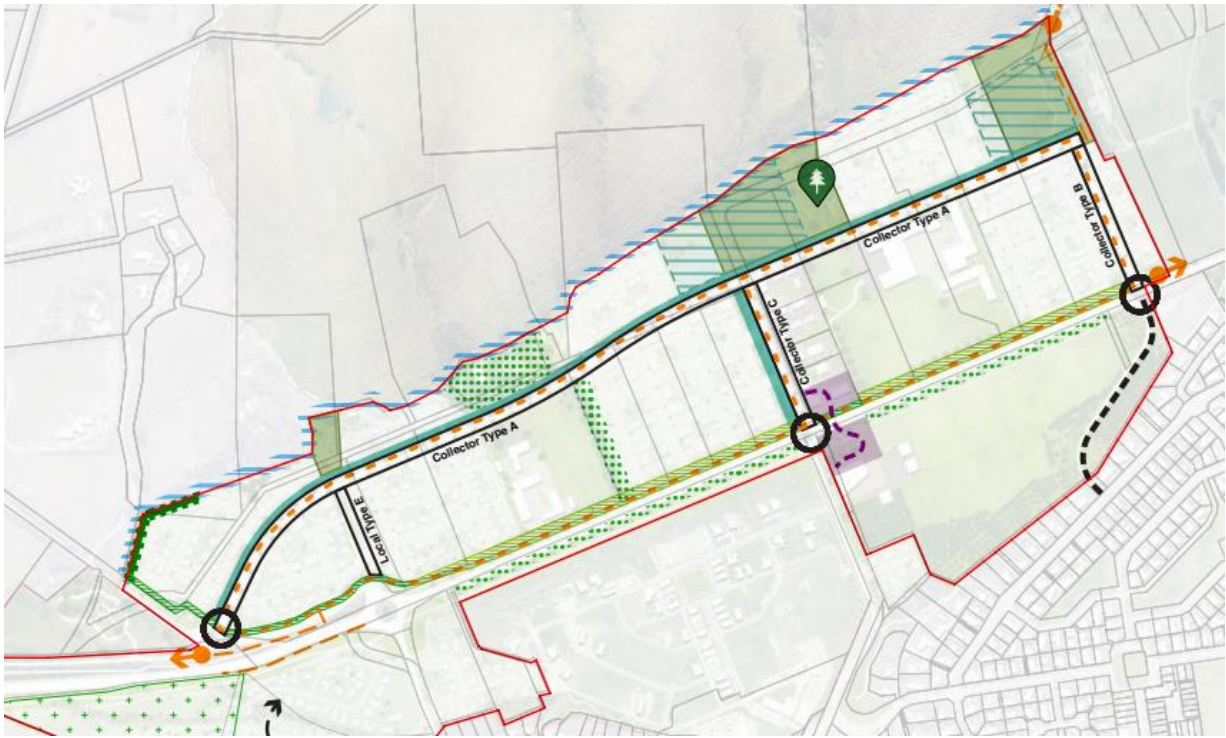
Chairperson

Arrowtown Village Association

## GLENPANEL LP SUBMISSION: QLDC LADIES MILE MASTERPLAN

### Introduction

1. This is a submission made to the QLDC Te Pūtahi Ladies Mile Masterplan in relation to developers and Council partnering on the delivery of infrastructure.
2. It is our understanding that the QLDC led Ladies Mile Masterplan was initiated by Council to enable co-ordinated development along Ladies Mile. By doing a masterplan, there is ability to think strategically about the design and objectives for the area. The objectives of the masterplan project, as stated on QLDC's website, are:
  - *A land use solution is delivered in a timely, integrated and organised manner, avoiding individual applications*
  - *Increased liveability, well-being and community cohesion for existing and future residents of the Ladies Mile area*
  - *Improved access to and from Ladies Mile with a transport network that can deliver its functions efficiently and effectively*
  - *Supporting enhanced public transport and walking and cycling options through land use solutions*
3. Council has been the driver and lead development in the Ladies Mile masterplan area through the provision of a shared masterplan and subsequent plan change. For the co-ordinated development vision set by the masterplan to become a reality, we believe core infrastructure, primarily the three collector roads (shown in Figure 1 below), needs to be implemented upfront with continued Council lead involvement.



**FIGURE 1 MASTERPLAN COLLECTOR ROADS (IN ORANGE DASH)**

## Infrastructure Delivery

### Infrastructure Timing

4. The Ladies Mile provides the opportunity to establish dwellings at a density that can support improved community facilities and recreational areas to what will likely become the largest population centre in the Wakatipu Basin. The challenge with this area is that it needs to be properly planned to support such a large population and also to ensure that the development supports passenger transport modal shift.
5. It is important to note that development on the northern part of Ladies Mile will not happen overnight. Without core infrastructure laid out early, outcomes that align with the masterplan design, but not philosophy might eventuate.
6. We believe the way to deliver quality outcomes is through principle-led comprehensive development that aligns with and delivers on the 'Grow Well' or 'Whaiora' framework from the Spatial Plan, and objective of the Te Pūtahi Ladies Mile Masterplan, including 'timely, integrated and organised' development.
7. We believe development of the collector roads early will enable the development along Ladies Mile to occur in an efficient manner to help meet the housing and associated community infrastructure needs of the Queenstown community.

## Infrastructure funding

8. The Infrastructure Funding and Financing Act 2020 (IFFA) was created to ease the pressure on councils to fund infrastructure for greenfield and brownfields development. By making provision for off balance sheet funding models to lead and facilitate development. The IFFA was developed with high-growth councils such as Auckland, Tauranga, Hamilton and Queenstown in mind, in an attempt to alleviate escalating land costs due to the inability of a council or developers to fund the up-front costs of infrastructure.
9. The IFFA allows councils to finance infrastructure through the creation of a Special Purpose Vehicle ('SPV') such as a company, limited partnership, Crown entity etc. when requested by any person proposing the use of a levy for the purpose of installation of infrastructure. The SPV will act as the entity that obtains financing for the purposes of the installation of infrastructure.
10. As per section 8 of the IFFA, infrastructure which can be funded by the IFFA is limited to:
  - Water services
  - Transport
  - Community/Community Facilities
  - Environmental Resilience Infrastructure.
11. The effect of the IFFA is to allow a council to provide debt funding for the installation of infrastructure within new developments and then for a levy to be attached to a rating unit. Levies proposed under the IFFA are extremely flexible and can be used within the following parameters, namely that they can:
  - Be proposed by any person
  - Be proposed for new infrastructure or upgrades of existing infrastructure
  - Do not have time limits for collection (outside of that which is initially proposed)
  - Be used for infrastructure on Māori land.
12. The effect of the IFFA is to allow a council to provide debt funding for the installation of infrastructure within new developments and then for a levy to be attached to a rating unit. The IFFA could allow QLDC to get a loan from this infrastructure fund to develop the collector roads in Te Pūtahi Ladies Mile. We believe the IFFA and the fund was created specifically for situations like this and that QLDC should be utilising the tool Central Government has very intentionally provided, and provided with high growth Council's in mind.

## Strategic Partnership

13. Currently QLDC are actively facilitating up-zoning of Ladies Mile via a master plan and the ensuing district plan amendment. It is our opinion that this proactive approach to delivery of infrastructure would complement Council's vision and provide well-rounded project outcomes.
14. If Council were to form a strategic partnership around delivery of services, specifically the collector road and potentially stormwater, then the development of Ladies Mile is more likely to eventuate as envisioned by the re-zoning, and the masterplan objectives realised.

## Conclusion and Relief Sought

15. We believe for the Te Pūtahi Ladies Mile masterplan to be implemented efficiently and effectively and meet the project objectives, there needs to be strategic partnership between Council around the funding and delivery of critical infrastructure.
16. Instead of developers building core roads bit by bit, Council can do it in one go. There are off balance sheet funding models from Central Government to enable Council to take such initiative.
17. We seek that Council investigate and potentially utilise the IFFA or another funding alternative to deliver the Te Pūtahi Ladies Mile's collector roads.

## **LAKE HAYES ESTATE AND SHOTOVER COUNTRY COMMUNITY ASSOCIATION (LHESC)**

26 May 2021

### **To Whom It May Concern**

The Ladies Mile masterplan and proposed plan change is opposed while key issues remain outstanding. As we do not support the proposed masterplan we have not submitted on the draft planning guidelines separately but we would like it noted that

We would like to identify also that while the Council has pushed ahead with this master planning process, the community has never been in support of the Council's master planning of development at Ladies Mile, particularly when this is paid for by ratepayers and has been prioritised above other areas within the district with better ability to absorb development.

Our community has now organised two, very well attended, public meetings with residents at each to express our concerns to the Council. The following is collated by input from the LHE and SC Residents.

It is important that these concerns are addressed. To date they have not.

### **Our key concerns with the proposed development at Ladies Mile are as follows:**

- **Effects on transport congestion.**
- **Effects of residential development in greenfields sites that is physically separated from urban centres (and the ongoing effects on traffic)**
- **The effects on intensification in existing centres by enabling further sprawl; i.e. enabling greenfields development reduces demand for intensifying within the existing centres)**
- **Use of prime agricultural land for residential development instead of intensifying existing urban centres**
- **Potential for residential development without the infrastructure and community facilities that are needed for the existing community.**

**We request that the Ladies Mile is managed via a deferred zoning. As such, any up-zoning will be deferred until such time as:**

- **Urban centres are intensified (Queenstown, Arrowtown and Frankton).**
- **Traffic solutions are found that meet the needs of the existing community.**
- **There are community facilities established that provide for the existing community and any future growth.**
- **There is certainty that a high school and primary school will proceed.**

**The following provides further explanation of our concerns.**

## **Transport**

Based on the feedback to our queries, we believe that the transport effects of increased residential development at Ladies Mile can not be mitigated. The level of congestion currently experienced will, based on the proposal, only get worse. For this reason the community is opposed to any residential development at Ladies Mile. The proposal relies on a mode shift of 40-50%. We recognise that there needs to be a mode shift and would like to see incentives for modal shift occurring now in order to see what is realistic or achievable in easing the existing commuter congestion. Examples provided by the traffic expert of places where there has been significant mode change are not in New Zealand, therefore we question their relevance; a mode shift has not occurred in Auckland or Christchurch and we question whether it will happen in Queenstown? We are aware of the difficulties faced given the different roles of Waka Kotahi, ORC and QLDC. We are concerned that these organisations are not working together to reach solutions.

It is our submission that before Council considers enabling residential development at Ladies Mile, solutions to the existing traffic issues must first be resolved. This is a wider issue than the existing residents within Lake Hayes Estate and Shotover Country, it is an issue resulting from the wider development and growth in areas such as Cromwell, Wanaka and Gibbston. It is not reasonable to pin the blame on our community. If traffic is to be managed, then regional public transport initiatives must first be in place and proven to work.

Ladies Mile is a rural site that is physically separated from any town centre and its associated services and employment, the plan change is attempting to suggest that it can create a live-work environment but based on our experience with previous local subdivisions, achieving commercial development is always difficult. In reality Ladies Mile will also become a commuter suburb.

We disagree with those saying that a new bridge would only move the problem up the road. When heading into Frankton the roads turn off in many directions (Glenda Dr, Remarks Park, Qtn Central, 5 Mile, Jacks Pt and Downtown Queenstown. And the opposite is the case at the end of the day when you have all these locations merging to get back over the bridge. If NZTA has no budget to upgrade the bridge then QLDC cannot approve a plan that adds extra traffic to the congestion creating further problems. We have requested that the Council survey our community, and Cromwell, Arrowtown and Wanaka and find out where they are travelling to, and what solutions may then work. It is preferable to use information on the ground rather than rely on traffic models that even the traffic expert admits he doesn't understand. Queenstown's situation is distinct; we have different drivers and we live here for different reasons (than for instance why someone would live in central Wellington). Comparing Queenstown to the likes of Aspen also does not work because we have different legislation and governance structures.

Further more the continual construction of buildings at Ladies Mile will add more traffic to the exciting traffic in the form of earth works and construction vehicles and trade vans from the initial ground works (plumbers) to completion (carpet layers). There is no possible way a mode shift can happen for these workers therefore the masterplan is adding to traffic congestion long term with no adequate solution to reducing traffic.

Please also see attached a further document prepared regarding concerns around the traffic modelling and transport strategy provided for consultation.

### [Feedback on Traffic Management Modelling](#)

The Consortium has provided no assurance that traffic effects can be adequately managed. Our community is already affected by traffic congestion and this will only get worse. For this reason we oppose the proposal to develop Ladies Mile.

### **Car parking**

We are concerned by the limited car parking provided in the master plan. Ladies Mile is not located in a town centre, and it will be extremely difficult for a town centre to establish here, maximum car park rules only work in town centres where there is existing employment and services. Remarkables Park and the existing Queenstown Town Centre are good examples where such rules could work. This is because people can live in these locations without the need of a car. Lake Hayes Estate and Shotover Country currently attracts families and "tradies " who rely on cars and work vans. Further, it needs to be recognised that we live in the lakes district, there are adventure activities, walks, biking, and sites to see in so many random places not to mention kids sports/activities. Alongside that a significant proportion of families also own some kind of recreational vehicle such as boat, caravan, motorbike which also need parked. The pretty pictures of green will be covered with cars backed up on kerbsides around the neighbourhood. We do not agree with the masterplan as adequate car parking is not provided.

### **Active Travel**

In order to encourage active travel a more direct commuter route needs to be established. This was not shown on the masterplan. Long detours across the old bridge does not encourage active travel or modal shifts. Building a new active travel bridge or connecting one under the existing bridge may help achieve more mode shift but this is not shown on the masterplan. In terms of connections, and contribution towards active travel, there are no linkages proposed up Slope Hill, or through to Lake Hayes. Therefore based on the above lack of detail to increase active travel we oppose the proposed Ladies Mile masterplan.



## **National Policy Statement – Urban Development (NPS-UD)**

In our opinion the proposal to develop Ladies Mile is contrary to the objectives and policies of the NPS-UD.

The objectives and policies refer to ‘urban environments’ and therefore they do not actually apply to Ladies Mile. Ladies Mile is currently rural. However, in comparison, Queenstown, Frankton and Arrowtown are urban areas. It is these areas that should be addressed first, because they contain the services and infrastructure to support intensification. It is these urban areas that should be accommodating intensified development. By doing so these issues of transport, effects on emissions, are better resolved.

In terms of Ladies Mile, while it could be said that the master plan proposes intensification from its current zoning, it is a significant change in zoning from one purpose to another; i.e. from rural lifestyle to high density residential. It is more a fundamental change than intensification. Further, as above, it is not intensifying an urban area, but creating a new urban area.

The following provides our brief assessment of the proposal against the relevant objectives and policies of the NPS-UD

*Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.*

The Ladies Mile is not an urban environment and its development, as currently proposed, does not enable our community to provide for their social, economic and cultural wellbeing.

A key issue is of course transport. It is our understanding that the level of congestion experienced now is a best case scenario moving into the future. That is because even if 50% of the existing community and 50% of the new residents within Ladies Mile use public transport or alternative modes, then the level of traffic remains the same as it is now. This reduces our community's wellbeing significantly.

Further, there is no ability to control the traffic movements from Wanaka and Cromwell. These towns are growing, and the number of people commuting to Queenstown is increasing year by year.

*Objective 6: Local authority decisions on urban development that affect urban environments are: integrated with infrastructure planning and funding decisions; and strategic over the medium term and long term; and responsive, particularly in relation to proposals that would supply significant development capacity.*

Because of the traffic issues Ladies Mile does not represent integrated management with infrastructure planning.

*Objective 8: New Zealand's urban environments: support reductions in greenhouse gas emissions; and are resilient to the current and future effects of climate change.*

Providing for future growth in a greenfields location that is physically separated from services and employment is contrary to objective 8. Ladies Mile provides productive soil, and is flat and (mostly) sunny. While the plan change proposes some commercial uses so that there may be some live-work created, to achieve a live-work environment requires the creation of a new town centre. This is instead of intensifying residential development in existing centres that already have those services.

What plans are in place for ensuring developers are doing their bit to overt climate change ie what systems will be rewarded or enforced such as solar or wind power?

*Vision 2050 - Our district is a place where our quality of life is enhanced by growth through innovation and thoughtful management"*

Unless there are incentives for innovation (green roofs, green walls, tennis courts/pools on roofs, solar, wind etc) we are concerned the developers will continue to build to minimum and uninspiring standards. QLDC have the opportunity to reward innovation that supports "Live. Work, Play" and climate change but there is no indicated to this effect on the masterplan.

### **Wakatipu Basin Land use Study**

The Wakatipu Basin Study identified that there are two areas where comprehensive planning should be undertaken. At paragraph 1.26 it identifies two areas, being Arrowtown and Ladies Mile. It is queried why focus has only been applied to Ladies Mile? Is it developer driven?

### **Extract from PDP:**

Ladies Mile is currently zoned Rural Lifestyle Zone with a minimum lot size of 2ha. The description in the PDP reads:

*The Rural Lifestyle zone provides for rural living opportunities with an overall density of one residential unit per two hectares across a subdivision. Building platforms are identified at the time of subdivision to manage the sprawl of buildings, manage adverse effects on landscape values and to manage other identified constraints such as natural hazards and servicing. The potential adverse effects of buildings are controlled by height, colour and lighting standards.*

*Many of the Rural Lifestyle zones are located within sensitive parts of the district's distinctive landscapes. While residential development is anticipated within these zones, provisions are included to manage the visual prominence of buildings, control residential density and generally discourage commercial activities. Building location is controlled by the identification of building platforms, bulk and location standards and, where required, design and landscaping controls imposed at the time of subdivision.*

The rules provide:

Building height more than 8m= Non Complying

Residential density more than 1 house per 2ha= Non Complying

The proposed rules for the Ladies Mile propose non complying where activities or development are contrary to the Structure plan. That gives no greater certainty than the existing zoning, given that it is the same activity status as what currently exists. As we have identified above, a preferred option is a deferred zoning- enabling Council to freeze development of the land into 2ha lots until such time that capacity is needed.

The Ladies Mile is outside of the Urban Growth Boundary. The urban growth boundary wraps around the existing urban settlements of Frankton, Quail Rise, Shotover Country and Lake Hayes Estate

The relevant provisions are contained within Chapter 3: Strategic directions and Chapter 4: Urban Development. We consider the following of particular relevance:

Policy 3.1.13

*Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Queenstown, Frankton, Jack's Point and Arrowtown), Wānaka and where required around other settlements. (relevant to S.O. 3.2.2.1)*

3.1.14

*Apply provisions that enable urban development within the UGBs **and avoid** urban development outside of the UGBs.*

Chapter 4: Urban development

*Policy 4.2.1.2 Focus urban development primarily on land within and adjacent to the existing larger urban areas and, to a lesser extent, within and adjacent to smaller urban areas, towns and rural settlements.*

*4.2.1.3 Ensure that urban development is contained within the defined Urban Growth Boundaries, and that aside from urban development within existing towns and rural settlements, urban development is avoided outside of those boundaries.*

*Policy 4.2.1.5 When locating Urban Growth Boundaries or extending towns and rural urban settlements through plan changes, protect the values of Outstanding Natural Features and Outstanding Natural Landscapes*

Ladies Mile is outside the urban growth boundary. Therefore, its change from rural to urban requires an amendment to the UGB. Such a change needs to be assessed against the strategic objectives and policies. It is concerning that this analysis does not appear to have occurred.

Ladies Mile is adjacent to an ONF (Slope Hill) and is in close proximity to Lake Hayes (also an ONF, and extremely sensitive to land use change), and on the entrance to Queenstown. It is a highly valued landscape that will be adversely affected by the proposed level of development. We are concerned that the proposed built form would be visible from the State Highway as it passes Lake Hayes, and would block views of the Slope Hill outstanding natural feature.

An assessment of whether the Ladies Mile area should remain rural as opposed to becoming urban has yet to be undertaken. That assessment is needed to determine whether it is appropriate to extend the UGB.

Our community has been told by Mr Avery that 'if the developers wish to develop, then Council and the community can not do anything to stop them', then is the council going to stop the developers for obtaining non complying activity consent for development contrary to the master plan?

### **Recent ORC Submission**

We agree with the reasons ORC put forward recently to decline the application for a 12 Lot subdivision at 466 Ladies Mile. We believe these reasons also stand for 200 times more dwellings proposed for Te Pūtahi/Ladies Mile.

### **[ORC Submission requesting decline of application 466 Ladies Mile](#)**

### **Density**

Within the guiding principles which state *“Do density well, provide quality and diverse housing”* it is unclear how the new masterplan provides diverse housing? Although it is marketed as Te Pūtahi which includes the existing LHE and SC, there is very clearly a physical divide in the way of SH6 and the masterplan creates one side of high density and one side as less dense. This divide becomes even more obvious when a further primary school (although needed) is established as this creates two quite different primary school communities – the diversity is no longer shared across the whole of Ladies Mile/Te Pūtahi.

Who is the target market for high density living? Is it younger people - do they want to live so far away from amenities such as supermarkets/bars/cafes/restaurants/ attractions? Is it Families – do families want to live on the 4<sup>th</sup> floor with half a car park? Is it “tradies”, as this existing area appears to attract but where will they park their work vans? Is it retirees –again would they prefer to live closer to amenities and recreation activities?

We would expect to see an allocation for affordable housing and for the Community Housing Trust to be involved. How do you ensure that developers are contributing to this at an acceptable percentage?

### **Self Sustained & Connected Communities**

Can there really be sufficient amenities within Te Pūtahi to create a self sustained community? It cannot be self sustaining without a town centre that provides work, live and play options. The commercial area is only really viable for small business owners therefore how much “work” will this really create in this area?

How long will it take for developers/business to want to buy into and set up commercial - they need the population first to sustain a business - therefore we are left with the scenario we have seen in the past - residential comes (a long time) before commercial which equals traffic on the road. We are concerned that the Council can not force developers to construct and operate commercial uses. Even Hobsonville in Auckland has struggled with this, and it has become a commuter suburb. It is based on this lack of trust in both developers and QLDC to simultaneously develop commercial, community amenities and residential that we oppose this masterplan.

### **Secondary School**

Our community association has been told that the Ministry of Education does not wish to locate a high school in the proposed drawing on the masterplan, and that its preferred location is 516 Ladies Mile. We understand that this is the result of an extensive assessment by the Ministry to determine the most appropriate site.

The community is not opposed to the location of a high school at 516 Ladies Mile, but this is subject to co-location of the high school with community facilities. We believe there is actually significant benefit in such co-location. There is 14ha available, so even if the school requires 8ha, then of that remaining 6ha the community could have community hall/facilities, and could share the sports fields/courts with the School. This would cost-share the construction and ongoing maintenance of sports facilities.

It is our understanding that the high school will be needed by 2030 whether or not Ladies Mile proceeds. There is an opportunity for the Ministry of Education to work with the community to achieve a facility that provides for both the needs of the Ministry and the needs of our existing community, in addition to future communities.

We believe that a win-win solution could be achieved here. We request that the Council and Ministry engages with the community to find a mutually beneficial solution. Providing both education and community facilities is extremely important to our community, and there is an opportunity to achieve both. We support the school at 516 also because it avoids the situation whereby we get more residential development without the promised infrastructure and facilities.

We also note that the community feedback on the three options preferred the location of the High school at 516. Therefore it is odd that there is a suggestion that our community would be opposed to that proposal.

Secondary schooling on Ladies Mile, will potentially ease traffic volume over the bridge and allow a significant number of children to walk and bike to school.

In summary, if the school can co-locate with community facilities at 516 Ladies Mile, then its location at this site is supported. The community supports the provision of a high school and sees benefit in a high school co-locating with community facilities.

### **Entrance to Queenstown**

*“We are the place the rest of the world cannot be”* quoted from QLDCs own Vision 2050. There are plenty of places in the world where we can sit in traffic jams and see high rises as the entrance to the town/city! How many places in the world can you drive into the town past a picturesque lake, look up to a mountain range on the left (with residential is set back from the main road) and look right to sloping hills, farmland and yet another mountain in the distance?

The Ladies Mile is the entrance to Queenstown, providing high levels of visual amenity. While the quality of the views towards the Remarkables have been reduced because of the retirement village, there still exists views towards Slope Hill, which is an outstanding natural feature. Locating dense, high built form at the foot of Slope Hill will adversely affect the qualities of this landscape.

In ORC’s recent submission it also cites Ladies Mile as an area of local significance and we very much agree. “The site is located within the Ladies Mile Corridor between Shotover River and Lake Hayes which is an area of significance for many locals, and is often seen as a gateway into Queenstown. The density of development has the potential to undermine this amenity landscape.”

*“Welcome to Queenstown - it is unclear how long it will take you to reach your destination after you pass Lake Hayes, but sit in traffic and enjoy the welcoming views of highrise apartment blocks from your crawling vehicle!”* Councillors - do you want this to be your legacy??

### **Lake Hayes/Stormwater**

The natural topography slopes towards Lake Hayes. The proposal to integrate stormwater management into the development is supported. However, we remain concerned that the stormwater discharges from such dense development will be difficult to manage. Lake Hayes is so sensitive that extreme care is needed to ensure that there will be no effects on the Lake.

Who will pay for the upkeep of the Lake Hayes track and protection of Lake Hayes with so many more users on its doorstep – is this budgeted?

### **Sylvan Street**

The CA has had strong feedback from Sylvan St residents who oppose the new road across reserve land in Sylvan Street. They oppose because:

1. The bus service is not used and there is no justification for adding another street for empty buses;
2. The new street will significantly detrimentally affect the amenity of the adjoining properties and those properties that front onto the 516 LM property where the new bus route/road will be built.
3. The existing Sylvan Street/LHE road design has not been built to provide for buses. Additional buses turning into and out of the new road will be too large and the new intersection will not be able to adequately accommodate the buses or new traffic. Again all of Sylvan Street will be detrimentally affected. It will be a total sh+t fight trying to get up and down Sylvan street if they put a new road in there.

### **QLDC Vision 2050**

#### **How will QLDC ensure that developers consider and adhere to this?**

*Everyone can find a healthy home in a place they choose to be* - will the housing proposed be at different standards and price points to encourage more people to be able to buy and live in this area? How will this be monitored and enforced?

*Our Māori ancestry and European heritage are both reflected and enrich our lives*- how are the heritage aspects being preserved and incorporated into the development. How are Māori values and ideology being considered within the masterplan?

*Artists and art lovers unite in both dedicated spaces and beyond the boundaries of venues and facilities* - where is the art and creativity opportunities within the masterplan? Who is responsible for and pays for this?

*Our people and visitors respect the privilege of accessing our rivers, lakes and mountains* - Where is the access to key destinations such as Lake Hayes, Slope Hill and Kowarau River going to be? This is not outlined in the masterplan.

*Our homes and buildings take the best ideas from the world, but use sustainable, locally-sourced materials* - what is the design palette going to be for this area and how is energy alternatives going to be promoted i.e. compulsory solar panels on roofs

*Zero waste is just something that we do here* - how will composting and recycling work in high density housing?

*Our public transport is the cleanest, greenest, innovative choice for district-wide connectivity - will the PT measure up to this statement - for existing commuters, before further development begins?*

*Active travel is an integral part of an accessible and safe network for all of our people - will the active network be direct, safe and cater for all ages?*

*Our infrastructure is as resilient as our people - will the infrastructure be designed to withstand an alpine fault quake? Who is responsible for this?*

## **Green Spaces**

Green spaces are especially important to the community. The masterplan shows very little detail in the way of exactly what the green spaces, reserves and recreation areas will look like. There is a lack of trust that developers will actually put in place adequate green and recreational spaces. Is there a decent playground and not just pocket park styles? Shotover Country has nothing (other than a scooter track for 5 year olds) so don't make the same mistakes. Kids need to be able to walk 10 mins or so to a decent playground ideally. Who will ensure that the ample trees and green spaces shown on the masterplan are firstly actually established and secondly continued to be upkept in the future - once again who pays for this long term?

## **Conclusion**

In conclusion, it is our opinion that the proposal to change the zoning of the Ladies Mile area from rural to a master planned, high density development is flawed. This does not represent intensification; it represents greenfield, dispersed development.

As outlined above:

- Ladies Mile is a greenfields site and is physically separated from services and employment. Whether it provides 1100 homes or 2300 homes, it will increase traffic movements in an already congested environment. Traffic is already causing significant adverse effects to our community's wellbeing. Until such time as the existing traffic issues are resolved, then there should be no further development at Ladies Mile.
- We have taken on board Mr Avery's concerns around existing zoning not being adequate to 'stop developers doing what they want'. We propose a deferred zoning. Any development must be deferred until such time that:



- Traffic issues are resolved; there must be a workable public transport system in place, and the Shotover Bridge provides four lanes. If these actions are not taken then traffic congestion will only get worse.
- The school sites are confirmed
- Community facilities for the existing community are provided, and there is capacity for future development.
- Existing centres are intensified to accommodate growth.

Until the traffic issues are resolved, the existing community is provided for, and greater certainty provided that the master plan can be achieved, then we oppose the Ladies Mile proposal.

Thank you for the opportunity to submit.

We wish to be heard in support of our submission

Kind regards

Lake Hayes and Shotover Country Community Association



**Sanderson**  
G R O U P

*The family name in luxury  
retirement living*

Wednesday 26 May 2021

To Queenstown District Lakes Council (QDLC),

**RE: Te Pūtahi Ladies Mile Draft Masterplan Survey**

Thank you for the opportunity to provide comment on the proposed draft masterplan for Te Putahi Ladies Mile. We would like to thank QDLC for the recent public consultation which we enjoyed and came away feeling that it was a constructive evening.

Queenstown Commercial Limited and Sanderson Group have significant interests in Ladies Mile as the 489 Frankton-Ladies Mile landowner, developers of the Kawarau Park medical / retail precinct and Kawarau Heights the residential subdivision, and the former owners of the Queenstown Country Club.

We have made large investments and enhanced the area setting a high standard through developing these projects while preserving the natural landscape and protecting the Ladies Mile gateway into Queenstown.

Generally we feel the proposed layout of the draft masterplan is good and would encourage QDLC to consider the following matters in finalising the master plan:

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan.

It is our intention that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Sanderson Group is interested in the proposal (masterplan and draft planning provisions) in its entirety. Without limiting the above, the specific provisions that this submission relates to are:

- a) Chapter 27 – subdivision and development;
- b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
- c) Chapter 8 Medium Density Residential;
- d) Chapter 9 – High density Residential;
- e) Chapter 15 – Local Shopping Centre Zone;
- f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
- g) Chapter 29 – Transport;

**Preserving the Ladies Mile gateway**

In working through the planning approval for the Queenstown Country Club we advocated for a 75 metre setback either side of Frankton-Ladies Mile to preserve the gateway and natural landscape. This decision has been proven in practice through the subsequent development of the Queenstown Country Club. While we would prefer the 75 metre setback was maintained along the complete length of Frankton-Ladies Mile we would be satisfied with a 50 metre minimum offset.

## **Developing a self-sufficient satellite community**

Reducing traffic impacts and eliminating the need to travel over the constrained Shotover River Bridge should be a key objective of the master plan given the current population of Lake Hayes and Shotover already exceeds Arrowtown and that the potential future population of 15,000 is significant in the overall context of the Queenstown Lakes region.

The masterplan has allowed for schooling and recreational facilities but further consideration should be made so it is developed as a self-sufficient satellite community where it can provide for itself and contains all the required services and lifestyle options needed without the need for travel.

An example in the North Island where planning has failed to address this situation is the daily gridlocked on the 10 km stretch of State Highway 2 crossing the Wairoa River between Omokoroa and Bethlehem where there are no alternatives but to travel this route for work and access to essential services.

To help mitigate this traffic issue the Western Bay of Plenty Council are implementing a plan change to accommodate an increased population of 2,000 for a total of 12,000 to 15,000 people at Omokoroa by providing a designated school area (bought by the Ministry of Education), additional zoning of high density residential land, and the approval of a large town centre on an 8 ha site within this area. This will significantly reduce traffic movements required to access State Highway 2 into Tauranga city.

The development of Ladies Mile must follow a similar approach and ensure that adequate space is provided not only for schooling and high density residential, but also for the town centre being the hub of the community. This hub needs to accommodate facilities that provide working, living and lifestyle options for the local community within this area.

### **Village Centre Extent**

The village centre needs to be appropriately sized and shaped to accommodate everything that is needed in a self-sufficient community and be a place that brings the community together.

We believe the ideal town centre would incorporate a central courtyard for community use surrounded by commercial and retail e.g. café and food outlets facing the north with supermarket on the opposite side. The courtyard would have outdoor dining area containing a playground etc. Other facilities would surround this area including commercial, essential retail and other services. This can be developed as low rise that is surrounded by higher density living.

We have provided Attachment 1 containing illustrative images of what a village community may look like developed around a central courtyard. A potential layout of this is also provided.

### **Streamlined Planning Process**

It is critical for both property owners and developers to be provided with future certainty. We believe that a streamlined application process for the required variation to the District Plan will help increase confidence in the intended outcome and associated timeline.

**General**

Within Chapters 15 and 19B in particular, the intention of creating a diversified mix of urban uses is supported, however provisions which require strict adherence to a structure plan layout should be reconsidered, as over-prescription at this stage of the planning framework can have the potential to limit quality urban design and responsive planning.

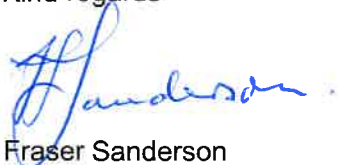
Within Chapters 27, 15, 19B, 29 and each of the notified residential chapters, there are requirements to upgrade infrastructure prior to development proceeding. While the intention of ensuring supporting infrastructure development in a timely fashion is supported, these provisions should also anticipate a greater degree of flexibility such as to ensure equitable, planning, and landowner-led outcomes. These provisions do not currently take into account future possibilities such as Government funding opportunities or changes in land use that could eventuate and effect timing and nature of infrastructure upgrades.

Although specific recommendations have been suggested to these planning provisions as set out in this submission, we are interested in, and submit on, the entirety of the proposal.

Sanderson Group seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.

We are welcome to discuss this feedback further in person and would encourage QLDC to consider this in finalising the master plan.

Kind regards



Fraser Sanderson

Chairman

Sanderson Group / Queenstown Commercial Limited

**Attachment 1: Village Community Concepts and Potential Layout**

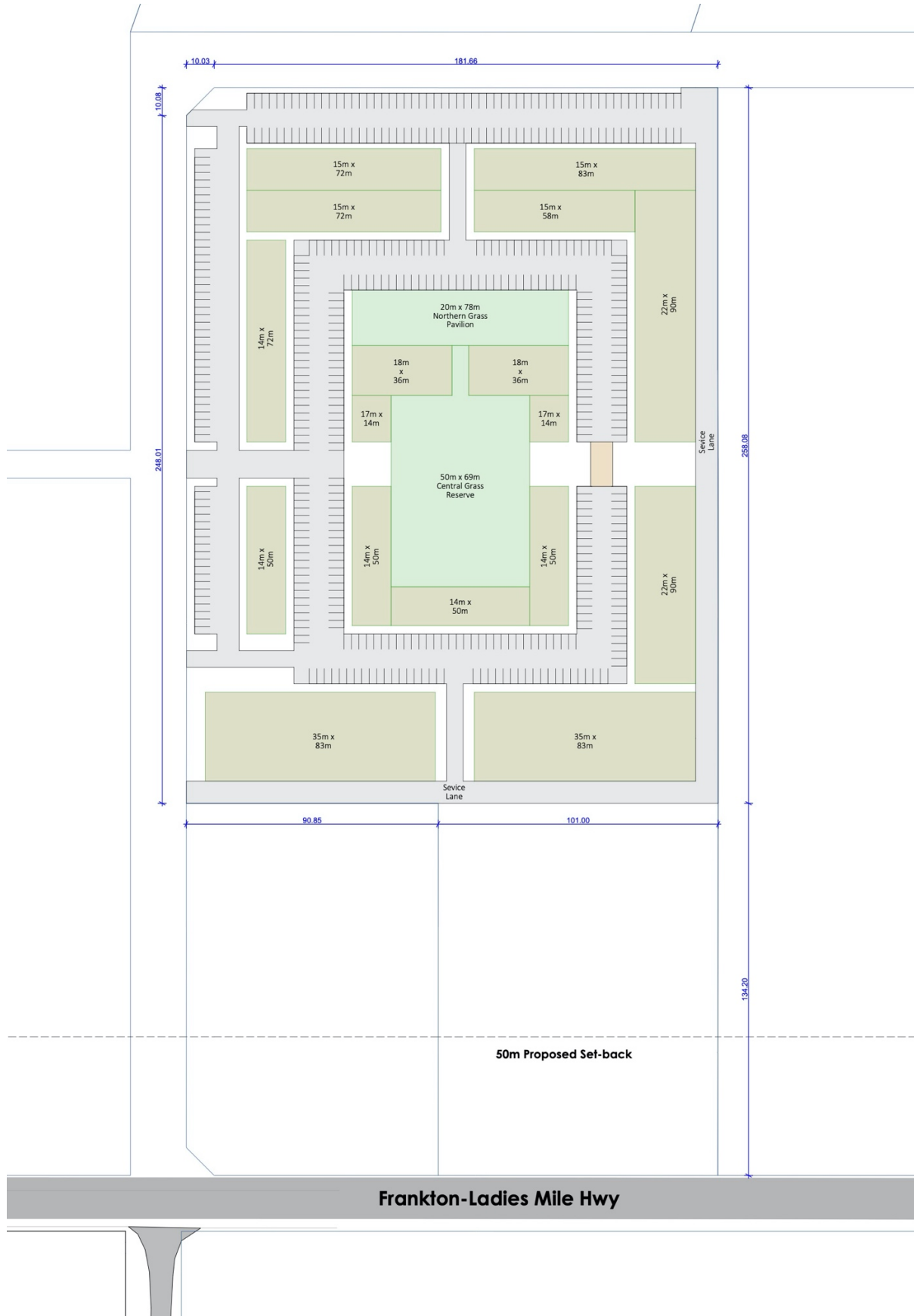
*Image 1: Concept image providing illustration of an outdoor area next to a central courtyard within a potential village centre.*



Image 2: Concept image showing architectural and landscaping of a potential village centre.



Image 3: Concept site plan for the potential village centre showing the central courtyard with various retail and commercial surrounding this.



P J and R T De La Mare – 14 Marshall Avenue, Lake Hayes

As residents who are directly affected by all of the options proposed, we draw your attention to the following:

- Reserve open space and stormwater management requires the use of Threepwood land.
- Part of the high density zoning along the base of Slopehill is also on Threepwood land.
- The walking/cycling trail at the base of Slopehill would cut through the only access between the farm and the farm buildings, including the woolshed, stock yards and heavy equipment sheds.
- Compromises the farming operation with high density neighbouring the property in its ability to operate from a Health and Safety perspective and problems associated that greater population brings in the form of dogs and the ability to ensure public stick to designated areas.
- Traffic in and out of McDowell Rd will increase from what is currently a semi-rural setting to residential traffic flows. Our ability as residents to enter on to Ladies Mile will be progressively compromised as a result. Also, pressure will mount for vehicle access to Lake Hayes as more and more people use Marshall Avenue walking access.



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**From:** Hans and Dot Arnestedt <arnestedt@xtra.co.nz>  
**Sent:** Friday, 21 May 2021 1:18 PM  
**To:** Liz Simpson <[REDACTED]>  
**Subject:** Ladies Mile Masterplan

Hello Liz

Thank you for your time this morning explaining certain aspects of the proposed subdivision and Master Plan at Ladies Mile.

We have considered the Draft Plans and wish to advise our concern regarding the following aspects of the plan.

1. The additional numbers of housing, apartments and commercial areas will mean additional strain (pressure) to the State highway. This will mean more cars and longer queues for people using the highway at certain times of the day.
2. The proposed buses on bus lanes may help reduce the number of people using cars to travel to Queenstown etc, but will also create a "bottle neck" at Shotover Bridge.
3. The potential heights of the proposed apartments being up to 6 storey is far too high for rural area. Such high buildings could be visible from the south end of Lake Hayes, Shotover Country Club, Frankton Industrial area, plus some of the south/western & eastern sides of Lake Hayes subdivision.
4. We assume that a condition to any subdivision will have a clause which protects the existing trees and hedging along SH6 and ensuring this be maintained and protected for the future

We presume we will now be contacted of any future submissions on this Plan.

Regards Hans & Dot Arnestedt

QLDC

re. "Ladies Mile Masterplan"

to whom it may concern

QLDC

28 MAY 2021

QUEENSTOWN

Dear Sir/Madam

Regarding your proposed "Ladies Mile Masterplan" - as a long-time Queenstown and Lake Hayes Estate property owner - we have great concerns!

Before any new development of this size - as suggested is taking place - the issue regarding the already existing traffic congestions has to be addressed prior and urgently!

The daily traffic jams - even at a time with very little or none tourist on our roads - is just ridiculous.

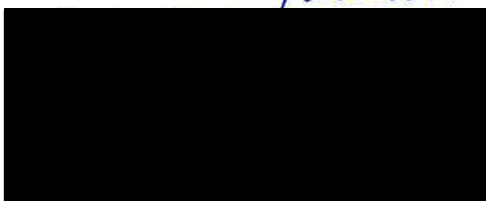
Like a man proposing to add on one to two thousand new dwellings!

The infrastructure in regards to carry the traffic volume has to be solved prior to any new development.

Kind regards

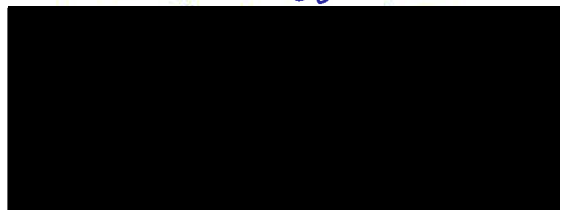
Robert Eyman

Robert Eyman



M. Zaugg

Martin Zaugg



**From:** Michael Ramsay <[REDACTED]>  
**Sent:** Friday, May 28, 2021 4:20 PM  
**To:** Let's Talk  
**Subject:** Ladies Mile Submission

I am against any further development along ladies mile until the ladies mile road has been made 4 lanes and the bridge access over the Shotover river improved. I would also like to speak when/if there is any future hearing date decided by council.

M.J Ramsay.

**27 May 2021**

**To Whom it may concern**

I am a long-term resident of Queenstown and have lived in Lake Hayes area for over 12 years. I oppose the Ladies Mile Masterplan as presented while key issues remain outstanding. I have been involved in the masterplan process as a key stakeholder from the outset and have raised the concerns below at every stage.

My key concerns relating to the proposed development at Ladies Mile are as follows:

**Traffic Congestion:**

- Whilst I appreciate the amount of work that has gone into the 100 + pages of traffic modelling / analysis and projections. I am not convinced that a credible and workable solution has been reached to mitigate the additional 2400 + units proposed within the masterplan and believe no development should happen until this is achieved. Trying to force a 40-60% modal shift without credible / workable transport solutions would have an incredible detrimental effect on not only my household but the current residents (over 4.5k) living in the LHE/SC area and those living east that need to travel through Ladies Mile.
- As no comprehensive study has been completed on the current Lake Hayes and Shotover Country residents to fully understand where they are going / what they are doing on various car journeys and why they are using private vehicles, the data sets are incomplete or rely on overseas / national models which do not take into account the unique characteristics of the geography and lifestyles of people who choose to live in the Queenstown Lakes. Eg on paper 6km – 7km to Frankton using active travel sounds awesome, doable and totally accessible, take into account the dangers of crossing an 80km state highway, detouring to cross the old bridge, our environment (its icy in winter...), plus a couple of rather large hills it becomes more of a less desirable way to travel (unless you have an e-bike which is a significant investment and relies on a certain level of disposable income).
- Very little consideration appears to have been given to the increase in development and residential areas east of Ladies Mile including Wanaka, Cromwell, Gibbston and Arrowtown which will all contribute to additional congestion through people travelling to work, travel (airport) and play eg the majority of sporting codes are part of the Central Otago groups necessitating travel around the entire area and as Queenstown, Frankton and Southern Corridor grow so does the need to move freight into the area – the majority of which comes along Ladies Mile.
- Whilst I support a modal shift towards Public Transport and Active Transport modes, these need to come prior to ANY development and need to be studied more closely eg. The Howards Drive roundabout. Taking into account give way rules people exiting the north side of Ladies Mile will have the advantage of gaps in eastbound traffic, followed by traffic flowing west along Ladies Mile, then..... Lake Hayes Estate residents. Given current levels of congestion, without additional residential or tourist traffic the people of Lake Hayes would essentially be trapped.
- I note that priority has been given to a bus lane on Howards Drive and along state highway six from Howards Drive to the Shotover Roundabout. Given the current service (apart from Arrowtown which does not stop here and the school buses) do not enter or exit this road or section of state highway I would suggest putting priority on the Shotover Roundabout to

Shotover Bridge route. Even if the bus was to exit Howards Drive the appeal for Shotover Country residents to get on a bus and travel away from their destination might not encourage uptake of PT.....

- The current plans allows for high density development at the western end of Ladies Mile as a starting point, how are those people to access public transport travelling west. The gold standard is within 400m of a household – however there appears to be no provision for public transport traveling through the new area, or how to safely cross the state highway in multiple places, or provision for development traffic – see above scenario for Howards Drive Roundabout if the 800+ households were to go ahead entering Ladies Mile via the Shotover Roundabout.
- No consideration has been given to building a new bridge over the Shotover. As someone who experiences congestion on a daily basis it is easy to see the amount of cars exiting onto Glenda Drive, Hawthorne Drive or into Five Mile or Queenstown Central. The argument that congestion would be pushed onto the BP roundabout assumes that the majority of people are travelling to Queenstown town centre. I had the pleasure of travelling into downtown Queenstown last week in only 5 more minutes than it takes me to get to Remarkables Park....
- As someone who was involved in the Frankton Masterplan process I have to ask why are we recreating a situation of community severance with a state highway running through the middle of a proposed residential area?
- I oppose the Sylvan Street bus / car link – Sylvan Street is not suitable for turning onto or designed for high levels of bus traffic. I question why the paper roads via Alec Robbins Road have not been fully investigated to provide an additional entry / exit point to the Lake Hayes area?
- I support the concept of Park n Ride facilities but suggest they be located further east catching traffic and commuters prior to them entering Ladies Mile. Adding anymore congestion to Howards Drive, the one and only exit for Lake Hayes Estate and the area for future community facilities would have a detrimental affect on our ability to safely enter and exit our homes for our children to safely enter the community facilities from Shotover.

The transport effects of increased residential development at Ladies Mile can not be mitigated. The level of congestion currently experienced will, based on the proposal, only get worse. For this reason I am opposed to any residential development at Ladies Mile. The proposal relies on a mode shift of 40-60%. That appears to be based on a **mode change that is needed, not what is realistic. The consultants acknowledge that the models used in some cases are unreliable or insufficient data exists to confidently model future transport behaviour.** Further, it is assumed that even with such a mode change the traffic congestion already experienced will only get worse.

### **Community facilities and Education Facilities**

- I fully support the development of 516 Ladies Mile for community and sporting facilities for the existing community and for the wider district in the future. As someone who travels multiple times per week to Frankton / Queenstown / other areas for sporting / social / swim lessons – you name it, we travel for it. The existing community has NO facilities to help with developing a connected , resilient, healthy community. We have no churches, sports groups, sports fields or spaces for mums and bubs groups, book clubs, yoga etc. The school is amazing but is over capacity. This was evidenced in trying to organise consultation for the Ladies Mile

Masterplan..... I ask that you look after the 4.5k of us that live in the area prior to any further development being considered.

- I support the provision of a high school and have no objection to it being co-sited with community and sporting facilities at 516 Ladies Mile as long as more usable green space is provided on the northern side of Ladies Mile to break up the housing and provide green space for residents on that side of the road. (Not another 300 units....) Relating to congestion I note that a high school if located in Ladies Mile would be needed by 2030 and I'm not sure that the modelling has taken into account that the large number of children (currently year 3-6) at the primary school would all be at high school in Frankton by then – necessitating XXX more trips across the bridge rather than reducing congestion....

The existing community needs to be looked after first and planning and provision for future needs must be confirmed before adding more development on Ladies Mile.

#### **Ability for QLDC to enforce the Masterplan and provision for certain areas not being developed**

- I have been asking this question from the start and am yet to be convinced that QLDC has the ability to enforce the masterplan. As you will be aware both Lake Hayes Estate and Shotover Country have had commercial and community facilities removed from original designs with more housing going in leaving both communities with very few options to develop a strong, connected, resilient community culture. How do you plan to ensure that each of the landowners will adhere to the masterplan? How can you make sure commercial facilities are developed prior to large scale development?
- There are certain covenants that already exist on the land included in the masterplan that have not been taken into account eg Laurel Hills and the areas surrounding the Pet Lodge. How can the masterplan be developed without taking these into account?
- What provision if any has been made in Transport Modelling and in particular Public Transport provision taken into account non-development of different areas. I am personally aware of two landowners that are not in support of the masterplan for their land and it concerns me that we may end up with "pockets" of high density housing without the commercial / public transport / active transport measures in place to support these areas and the existing community.

#### **Density**

- Ladies Mile is currently rural. However, in comparison, Queenstown, Frankton and Arrowtown are urban areas. It is these areas that should be addressed first, they already contain the services and infrastructure to support intensification and a live, work and play lifestyle more suited to high density housing. It is these urban areas that should be accommodating intensified development. By doing so these issues of transport, effects on emissions, are better resolved.
- In terms of Ladies Mile, while it could be said that the master plan proposes intensification from its current zoning, it is a significant change in zoning from one purpose to another; i.e. from rural lifestyle to high density residential. It is more a fundamental change than intensification. It not intensifying an urban area, but creating a new urban area.
- It is VERY difficult from the consultation documents to actually visualise and understand the masterplan, what might look like a green space eg High School which is not confirmed has an underlying density level of 300+ additional units. 7 story apartment buildings are intrusive

and would block not only sun, but views, not to mention questioning who would be attracted to living in this type of housing with no parking and no ability to live, work and play in their community. There is simply not enough employment opportunities planned within the Masterplan to support the people proposed to live there. They will have to travel to work.

- I also question why 516 Ladies Mile, if planned for community facilities, has a 12m high height limit?

### **Environment and Climate Change**

Living in Lake Hayes Estate I appreciate the rural setting, and it was a key factor in purchasing in the area (although it has changed in 12 years...) but we still have easy access to the river, gorgeous views along Ladies Mile on the way home and appreciate the wide- open spaces we have access to.

I am concerned about the lack of the following within the masterplan:

- Absolute certainty and a plan around making sure there is NO detrimental effects on Lake Hayes from development run off, stormwater run off, contamination. I note a stormwater drainage area close to Slope Hill, but could find no information categorically saying that it would not filter down to Lake Hayes.
- People come to live in Queenstown for our local environment, for the level of density the amount of green space (usable for a community garden, community event), picnics, throwing a ball around, small playgrounds etc appears to be lacking.
- No provision or planning for environmentally sustainable homes or above standard building design for warm, healthy homes.
- I appreciate the emphasis on public transport but question if designing a development around making public transport work (which appears to be the case) has overtaken the need to design for desirable, liveable development.
- Lack of consideration given to the fact that Ladies Mile is one of the few remaining suitable rural environments for future food provision and other rural activities for the Queenstown Lakes.

### **Conclusion**

I request that the Ladies Mile is managed via a deferred zoning or maintain its current zoning. If deferred any up-zoning should be deferred until such time as:

- Urban centres are intensified (Queenstown, Arrowtown and Frankton).
- Traffic solutions are found that meet the needs of the existing community and take into consideration future growth outside of the immediate area.
- There are community facilities established that provide for the existing community and any future growth.
- There is certainty that a high school and primary school will proceed.

Finally, I am aware that none of our current Councillors reside in the Lake Hayes or Shotover Country developments. I ask that you place yourself in our shoes, if you lived in a community that you love, contribute to and have built a support network within, would you have absolute confidence that the transport solutions and modal shift proposed are credible and achievable or would you be

concerned that you are being condemned to years of congestion, the stress of not being able to get to work on time after school / day care drop off because of an accident, rain or just traffic.....?

Would you choose to live in the proposed high-density development north of Ladies Mile or encourage your children to live there? Would you choose to live in or move to Lake Hayes or Shotover Country knowing the current levels of congestion and the certainty of increased congestion?

I ask that you consider the residents that already exist in the area and until we can be assured of transport solutions you look to other areas better suited to high density development with the infrastructure already in place to support high density living and more easily able to incorporate public and active transport provision.

Thank you for the opportunity to submit.

I wish to be heard in support of our submission

Kind regards

Anita Golden

████████████████████

████████████████



**Submission on Te Pūtahi Ladies Mile Masterplan**

To: Queenstown Lakes District Council (**QLDC**)  
letstalk@qldc.govt.nz

Submitter: G W Stalker Family Trust  
[REDACTED]

This submission is made on behalf of the GW Stalker Family Trust (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (**RMA**)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, generally known as 'Slope Hill'.

**Parts of the masterplan and planning provisions that this submission relates to:**

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
  - (a) Chapter 27 – subdivision and development;
  - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
  - (c) Chapter 8 Medium Density Residential;
  - (d) Chapter 9 – High density Residential;
  - (e) Chapter 15 – Local Shopping Centre Zone;
  - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre; and
  - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

**Reasons for submission:**

**Process:**

- 4 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 5 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 6 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 7 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 8 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

**Zoning map, ONL, and structure plan area:**

- 9 The northern boundary of the structure plan outline is sought to be amended to follow a refined ONL identification, based upon a finer grained assessment of the topography and values of this landscape unit. The extent of the proposed Structure Plan / Zoning Map should follow this refined boundary. This ONL is yet to be tested through the District Plan Review process and is not based upon a detailed landscape assessment. Within this location there is potentially further suitable land for further residential and lifestyle development, which is consistent with the intentions of the Te Pūtahi Ladies Mile Masterplan process. The Submitter seeks the ONL be amended and that developable land outside of the amended ONL be rezoned for either rural living (residential or precinct), or LDR, LLR, or included in the Masterplan if the process is to continue to RMA notification. The Submitter also seeks that the UGB be amended to align with the amended ONL.
- 10 The Submitters are concerned with lack of integration with adjacent rural and rural living development / land uses. There is a significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill, as well as existing lifestyle developments.
- 11 The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 12 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood, Slope Hill and Springbank Grove / Lower Shotover Road) given those land uses may be incompatible with, and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters.

**Decision sought:**

- 13 The Submitter seeks the following decisions from the QLDC:

- (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
- (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
- (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
  - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;
  - (ii) Greater recognition of amenity effects on, and protection of, adjacent rural, and lifestyle uses and developments, including in the form of increased setbacks, lower densities of development within the Masterplan, and more sensitive urban / rural mitigation and edge treatments;
  - (iii) Amendment of the ONL boundary at the base of Slope Hill such that developable land is included in the Masterplan and rezoned.
  - (iv) Amendment of the UGB to align with the amended ONL.

14 The Submitter wishes to be heard in support of this submission.

15 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

28 May 2021



GW Stalker Family Trust  
Signed by their duly authorised agents  
Anderson Lloyd  
Per: Maree Baker-Galloway  
Address for service: [REDACTED]

**Submission on Te Pūtahi Ladies Mile Masterplan**

To: Queenstown Lakes District Council (**QLDC**)  
letstalk@qldc.govt.nz

Submitter: Grant and Sharyn Stalker  
[REDACTED]

This submission is made on behalf of Grant and Sharyn Stalker (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (RMA)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, outlined in red on the zoning map attached as **Appendix A**.

**Parts of the masterplan and planning provisions that this submission relates to:**

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
  - (a) Chapter 27 – subdivision and development;
  - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
  - (c) Chapter 8 Medium Density Residential;
  - (d) Chapter 9 – High density Residential;
  - (e) Chapter 15 – Local Shopping Centre Zone;
  - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
  - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

**Reasons for submission:**

- 4 Specific recommendations to the notified chapter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

**Process:**

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.

**Zoning map and structure plan area:**

- 9 The Submitters are concerned with lack of integration with adjacent rural and rural living development / land uses. There is a significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill, as well as existing lifestyle developments.
- 10 The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 11 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood, Slope Hill and Springbank Grove / Lower Shotover Road) given those land uses may be incompatible with, and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters.

**Decision sought:**

- 12 The Submitter seeks the following decisions from the QLDC:
  - (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
  - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
  - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
    - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;

- (ii) Greater recognition of amenity effects on, and protection of, adjacent rural and lifestyle developments (in particular on Springbank / Lower Shotover Road), including in the form of increased setbacks, lower densities of development within the Masterplan, and more sensitive urban / rural mitigation and edge treatments.

13 The Submitter wishes to be heard in support of this submission.

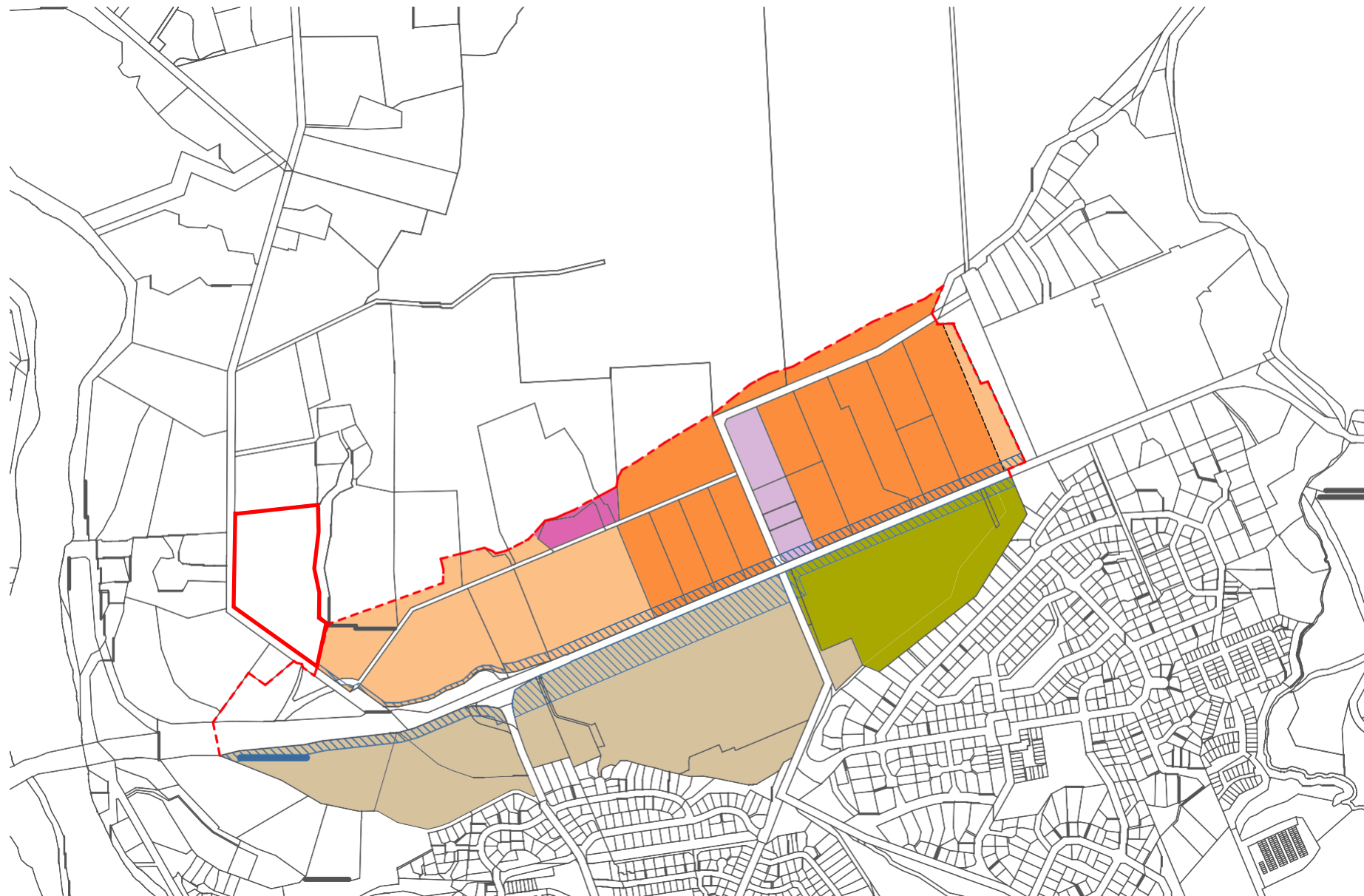
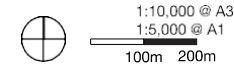
14 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

28 May 2021











Grant and Sharyn Stalker  
Signed by their duly authorised agents  
Anderson Lloyd  
Per: Maree Baker-Galloway  
Address for service: [REDACTED]

# Te Pūtahi Ladies Mile Zoning Plan



**Key**

-  Urban Growth Boundary Extension
-  Building Restriction
-  Town Centre
-  Local Centre
-  High Density Residential
-  Medium Density Residential
-  Lower Density Residential
-  Open Space - Community Purposes

**Submission on Te Pūtahi Ladies Mile Masterplan  
draft masterplan and planning provisions consultation**

To: Queenstown Lakes District Council  
letstalk@qldc.govt.nz

Submitter: Shotover Country No. 2 Limited  
[REDACTED]

This submission is made on behalf of Shotover Country No.2 Limited (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (RMA)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, outlined in red on the zoning map attached as **Appendix A**.

**Parts of the masterplan and planning provisions that this submission relates to:**

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
  - (a) Chapter 27 – subdivision and development;
  - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
  - (c) Chapter 8 Medium Density Residential;
  - (d) Chapter 9 – High density Residential;
  - (e) Chapter 15 – Local Shopping Centre Zone;
  - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
  - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

**Reasons for submission:**



- 4 Specific recommendations to the notified chapter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

**Process**

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 9 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

**Zoning map and structure plan area:**

- 10 The Zoning map is opposed on the basis of the level of prescription provided across the different areas of the Masterplan area. In particular, the densities associated with each of the LDR, MDR, and HDR are opposed, along with the anticipated variation of development of different activities in the local Shopping and Town centre Zones.
- 11 The Structure Plan is opposed on the basis of the level of prescription provided across different areas of the Masterplan area. It is unrealistic to expect that the multitude of landowners across the Masterplan area will be able to achieve this level of detail through multiple development / consent applications in the future. The prescription will not provide for creative and high quality design outcomes, which respond to evolving community desires and needs. In particular, the structure plan details which are opposed include:
- (i) Identified infrastructure requirements which do not take into account landowner boundaries or commitments to development, such as roading, stormwater, underpass and active links;
  - (ii) Open space, tree protection and stormwater management areas – which are not based upon a detailed effects assessment as to the needs of these to be retained, their size or location. There has also been no acknowledgement as to what management structures will be in place in the future, or what compensation will be made to landowners who are subject to these overlays, which will effectively prohibit any development or use of this land.
  - (iii) Identified sub-areas which are based upon an arbitrary grid-like pattern of development will not provide for creative or responsive urban planning, or take into account different land ownership needs and aspirations.

- 12 The proposed building height structure plan is opposed on the basis of the significant heights that are anticipated across the structure plan area. These heights are considered to be inconsistent with local amenity and not reflect community needs, culture, and history.
- 13 The Submitter seeks that the above plans be deleted and that the rezoning of the Submitter land, and surrounding land within the Masterplan be a mixture of densities ranging between rural residential / precinct, LLR, LDR, and MDR.

**Specific issues – inflexibility, density and infrastructure across all proposed chapters:**

- 14 The requirements across chapters 27, 7, 8, 9 to achieve an expected density within each zone or sub area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices (27.9.8.1(f)) should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.
- 15 Specific provisions across Chapters 27, 7, 8, and 9 relating to the provision of infrastructure prior to development proceeding do not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 16 The Submitters request that these requirements be deleted, and if replaced, are left to general controls in the subdivision chapter as to requirements for the upgrade and install of requisite infrastructure. In practice, necessary infrastructure can be designed and implemented on a development needs basis, and with private agreements between landowners if need be. The current level of prescription will have the perverse outcome of stagnating residential development.
- 17 Prescriptive wording used to achieve urban design outcomes across all chapters 27, 7, 8, and 9 is opposed. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom-line approach. This could have the adverse consequence of limiting development options, timeliness and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.

**Decision sought:**

- 18 The Submitter seeks the following decisions from the QLDC:
  - (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
  - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
  - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
    - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;

- (ii) Rezoning takes into account and provides for the community needs of limited and small scale / sensitively designed supporting zoning such as commercial and local shopping centre zoning, plus education and recreational opportunities;
  - (iii) Any such rezoning take into account a realistic amount of additional residential development that is supported by NZTA and which provides for an equitable outcome of development shared across different landowners in the area;
  - (iv) Requirements for infrastructure upgrades be realistic and proportionate to the development proposed and take into account past contributions made by existing landowners;
  - (v) Affordable housing and development contribution requirements are realistic and equitable such as to not dissuade affordable and efficient development of the land to market;
  - (vi) Structure plan restrictions on development, such as infrastructure areas, protected trees and recreation, be equitably offset / compensated with landowners.
- (d) Any further amendments to affordable and community housing contributions, or inclusionary zoning sought to be progressed through a planning variation or change should be progressed at the same time as this rezoning / master planning proposal.
- (e) The Submitter seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.

19 The Submitter wishes to be heard in support of this submission.

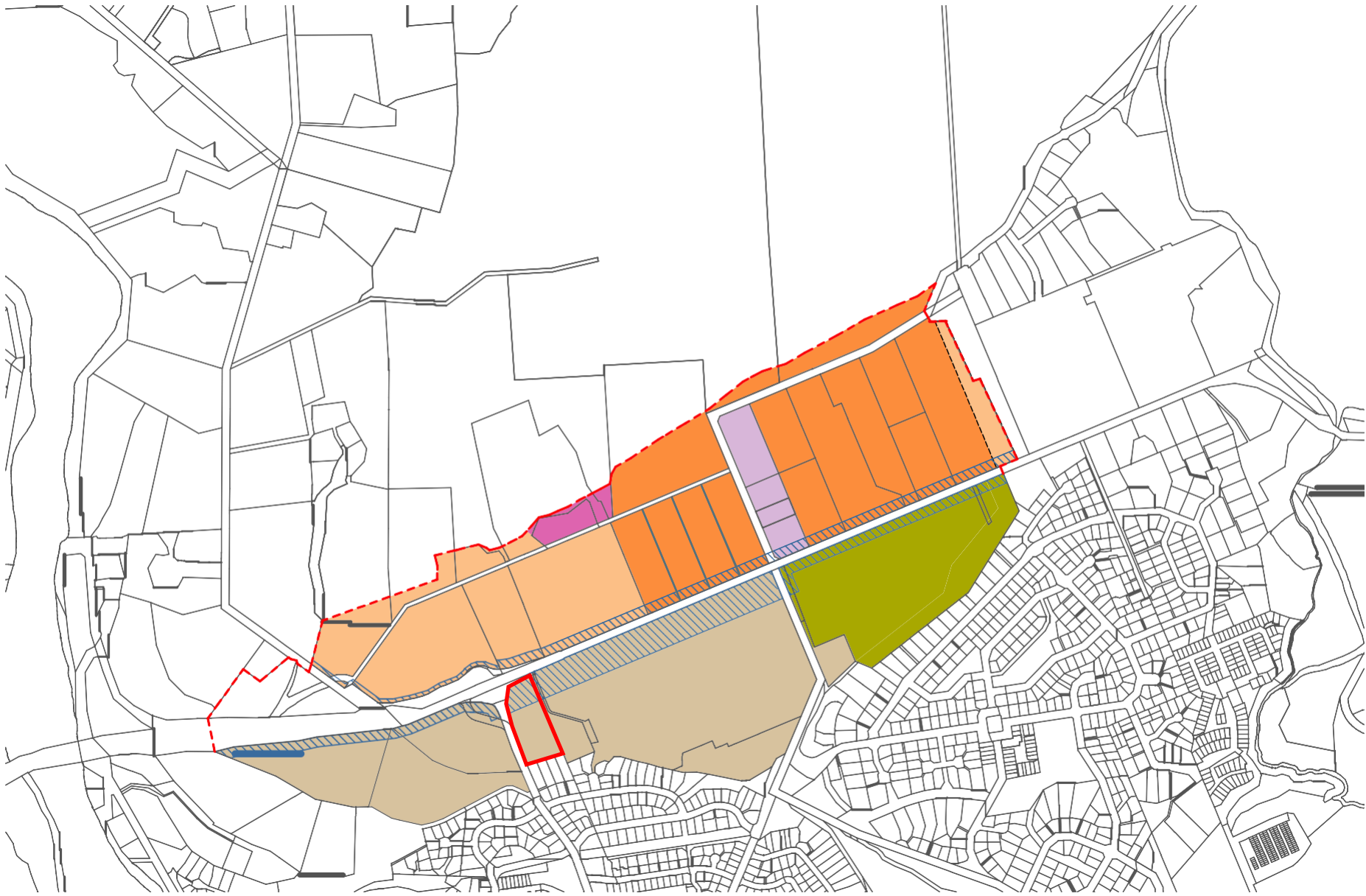
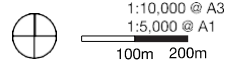
20 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

28 May 2021



Shotover Country No. 2 Limited  
Signed by their duly authorised agents  
Anderson Lloyd  
Per: Maree Baker-Galloway  
Address for service: [REDACTED]

# Te Pūtahi Ladies Mile Zoning Plan



- Key**
- Urban Growth Boundary Extension
  - Building Restriction
  - Town Centre
  - Local Centre
  - High Density Residential
  - Medium Density Residential
  - Lower Density Residential
  - Open Space - Community Purposes

26 May 2021

Corona Trust  
PO Box 2475,  
Queenstown 9349

VIA EMAIL: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

To the Queenstown Lakes District Council,

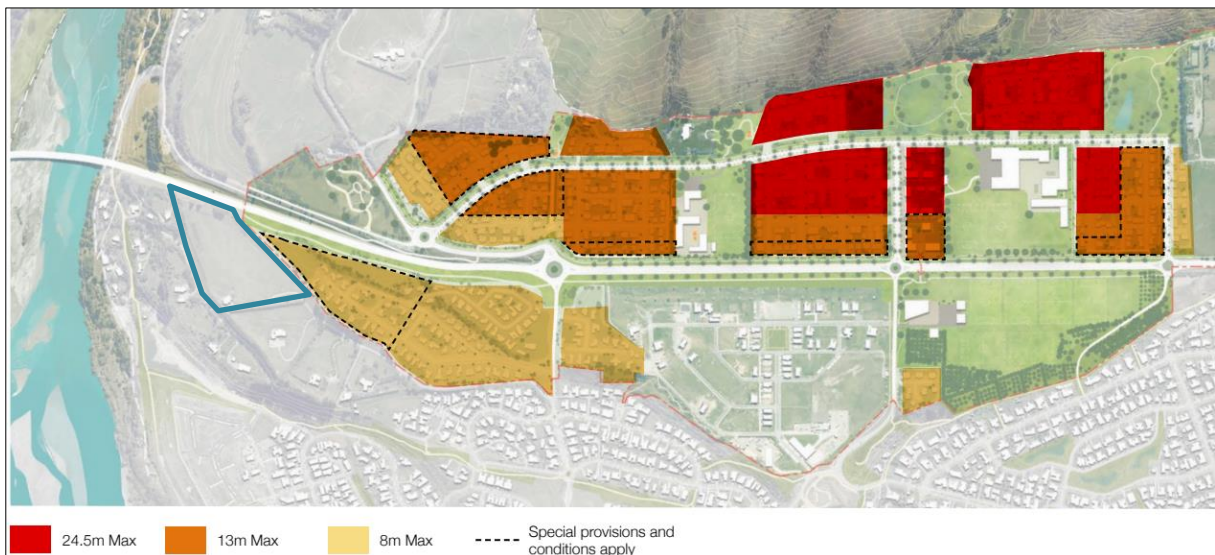
**TE PUTAHI LADIES MILE MASTERPLAN SUBMISSION**

**1 Introduction**

This submission is made on behalf of the Corona Trust on the draft Te Putahi Ladies Mile Masterplan released by the Queenstown Lakes District Council and the draft planning provisions to the Proposed Queenstown Lakes District Plan.

The Trust owns a series of landholdings in the suburb of Lower Shotover, Queenstown, as accessed via Max's Way. The land directly adjoins the boundary of the wider developable area associated with the Ladies Mile Masterplan framework.

The Trust land in relation to the Ladies Mile Masterplan Framework and wider development area is identified below.



*Subject site identified by blue outline.*

*Proposed medium density residential zone identified in yellow with 8m height limit*

The Trust land is situated in close proximity to existing and proposed areas of higher density residential development and is currently zoned Large Lot Residential, with residential development therein dispersed across a number of large lots (1000m<sup>2</sup>+).

Above the land, along the northern boundary, is the wider development area associated with the Master Plan which is proposed to be rezoned Medium Density Residential. The Master Plan proposes a 360m RL and 8m height limit for development within this area.

Further north is the Frankton Ladies Mile Highway which has a series of earth mounds that partially screen views into the proposed Master Plan development area. The Trust land is situated on a lower level terrace to the south that cannot be seen from the State Highway. Further south below the land is Shotover Country.

The Trust currently has an appeal lodged before the Environment Court in relation to Stage 1 of the District Plan Review Process which rezoned the land to Large Lot Residential. Our appeal relates to the height and boundary setback provisions imposed on our land via Chapter 11 of the PDP. This process is currently on 'hold' pending the outcomes of the Master Plan process.

## **2 Our submission**

Our land presents a valuable opportunity to the Queenstown Lakes District Council and the wider community to further increase the supply of affordable housing stock in the Wakatipu Basin in a manner that is both compatible with existing and proposed development and is affordable for the community based on existing service connections available.

As a result of recent efforts to increase the supply of affordable housing stock in the Wakatipu Basin, a large portion of land surrounding our site has either already been, or is proposed to be, rezoned to higher density residential land uses. As a result, service connections in the surrounding area, including to our site, have been improved with the network capacity increased, inclusive of power, telecommunications and three waters.

The Master Plan as it currently stands is anomalous with respect to why the Trust's land is excluded. The land does not provide any visual or rural buffer, and should be located within the Urban Growth Boundary under the District Plan. It is inefficient to not include this land and will likely mean that we will need to advance our current appeal before the Environment Court to address the zoning matter, leading to further costs and hold ups for the various processes, including the implementation of the Master Plan. The land should also be free of any height and visibility constraints from SH6 due to the lack of visibility from the highway.

3 **Outcome sought**

We request that the Trust's land be included as part of the wider development area associated with the Ladies Mile Master Plan framework, with the zoning consistent with the adjoining land area to the north – Medium Density Residential, or another suitable up-zoning to provide for higher density development.

I welcome the opportunity to further discuss this submission with the working party on behalf of the Trust.

Yours sincerely,



David Boyd on behalf of the Corona Trust

Corona Trust  
P O Box 2475  
Wakatipu  
Queenstown 9349

██████████

████████████████████



26 May 2021

Queenstown District Council  
10 Gorge Road  
QUEENSTOWN

RE:Ladies Mile Master Plan Process

The Roman Catholic Diocese of Dunedin (RCDD) registered at the outset with Queenstown Lakes District Council (QLDC) as an interested party with regard to the Ladies Mile Masterplan Project. Consultation with QLDC planners and Council appointed planners Brown and Company was undertaken (see attached email correspondence with Christine Edgely of Brown and Company Planning Group).

The RCDD indicated that we were interested and committed to relocating St Joseph's School to the new Ladies Mile development and would require approximately 3 hectares of land zoned for a new 300 pupil school and church. St Joseph's is a State-Integrated school and a part of the education network funded by the Government through the Ministry of Education. The RCDD indicated they were prepared to work with the Ministry of Education (MOE) and consider a co-location arrangement. The RCDD indicated that they were committed to a timeline of 5 years to have a new school up and running.

When the first early concept plan was released a 3ha Primary School site was proposed and RCD naturally thought it was for St Joseph's School, but have subsequently been informed that the two school sites proposed are both for the MOE. MOE apparently advised QLDC that they were not interested in a co-location with RCDD.

St Joseph's has not been considered in the current revision of the masterplan. St Joseph's currently has 15% of its pupils (37 in total) in Inner Queenstown and 85% of pupils (87 in total) reside and commute daily from Frankton, Shotover Country, Lake Hayes and Arrowtown, so by relocating to Ladies Mile we will reduce the daily commute to and from Queenstown by 70%. This will have a positive outcome for the transportation modelling on the daily flows at peak times on the State Highway to Queenstown.

Our modelling, based on QLDC and MOE projections, will see the demand for an increased provision for Catholic education in the QLDC area. Relocating to the Ladies Mile area is the logical move for us, as the majority of population growth is not at the Queenstown end of the region, where the St Joseph's is currently located. The expected level of growth would more than treble the transportation demands the school community places on the route in and out of Queenstown.



Over and above this the QLDC projections estimate that by 2051, the Wakatipu Basin will have a population similar to that of Invercargill, which has 4 Catholic Primary Schools and one

Catholic Secondary School. The Census data shows that 9% of the total population are Primary School age and of this 8.5% identify as Catholic. If these figures are applied to the projected population of 49,230, we could expect demand for Catholic schooling in the vicinity of 375 children, which is not feasible on the current site.

Decision Required: That the QLDC make accommodation in the masterplan for the Ladies Mile for another school site, and accordingly make the necessary rule changes in their District Plan Variation to achieve this outcome.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M J Dooley', written in a cursive style.

+ Michael J Dooley DD  
Bishop  
Roman Catholic Diocese of Dunedin

**From:** Christine Edgley <[REDACTED]>  
**Sent:** 10 May, 2021 3:50 PM  
**To:** Sydney Brown <[REDACTED]>  
**Subject:** Ladies Mile Masterplan - consultation

Hi Syd,

I trust this email finds you well.

Following up from previous consultation on early concept plans for the Te Putahi Ladies Mile Masterplan in November last year, the Council has now released a draft preferred Masterplan and associated draft plan variation for public feedback.


All the information can be viewed online at Council's Let's Talk page (<https://letstalk.qldc.govt.nz/ladies-mile-masterplan>) and you can undertake a survey on both the draft Masterplan and the draft planning variation via the same link.

Feedback is open until 5pm, **28 May 2021**.

Kind regards,  
Christine

**Christine Edgley**  
Resource Management Planner

T +[REDACTED]  
M +[REDACTED]

  
**BROWN & COMPANY**  
P L A N N I N G   G R O U P

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**From:** Sydney Brown <[REDACTED]>  
**Sent:** Monday, November 16, 2020 8:05 AM  
**To:** Christine Edgley <[REDACTED]>  
**Cc:** Gerard Aynsley <[REDACTED]>  
**Subject:** RE: Ladies Mile - early concept plans for Public Open Days

Hi Christine

Thanks for the concept plans. On behalf of the Catholic Diocese the proposed school sites all work for us ,our first choice would be option A as this gives the opportunity of co-location and sharing of

costs. Option B & C ,the only concern we have is connectivity ,as the transport plan only shows public transport on the shotover country side of Ladies Mile.  
Can you please forward me the final plan when it is publicly released.  
If you require any further input from me don't hesitate to ask.

Regards, Syd

Syd Brown  
Managing Director  
**Cranbrook Properties Ltd**  
PO Box 231 Mosgiel 9024

**From:** Christine Edgley <[REDACTED]>  
**Sent:** 13 November, 2020 11:34 PM  
**To:** [REDACTED]  
**Subject:** Ladies Mile - early concept plans for Public Open Days

Good evening Syd,

I understand that you requested to be sent a copy of the information for the material presented at the Public Open Days for the Ladies Mile Masterplan project.

Please find a link below to the Council's Let's Talk page, which includes the early concept plans:

<https://letstalk.qldc.govt.nz/ladies-mile-masterplan>

Kind regards,  
Christine

**Christine Edgley**  
Resource Management Planner

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Public Health South

Dunedin: Private Bag 1921, Dunedin 9054  
[REDACTED]

Invercargill: PO Box 1601, Invercargill 9840  
[REDACTED]

Queenstown: PO Box 2180, Wakatipu, Queenstown 9349  
[REDACTED]

## SUBMISSION ON TE PŪTAHI LADIES MILE MASTERPLAN

**To:** Queenstown-Lakes District Council

**Details of Submitter:** The Southern District Health Board

**Address for Service:** Public Health South  
Southern District Health Board  
PO Box 2180  
QUEENSTOWN 9349

**Contact Person:** Sierra Alef-Defoe

**Our Reference:** 21May04

**Date:** 17 May 2021

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### Introduction

Southern District Health Board (Southern DHB) presents this submission through its public health service, Public Health South (PHS). Southern DHB delivers health services to a population of 335,990 and has responsibility under the New Zealand Public Health and Disability Act 2000 to improve, promote and protect the health of people and communities. It seeks to promote equity and to reduce adverse social and environmental effects on the wellbeing of people and communities.

This submission is intended to provide general commentary to the Queenstown Lakes District Council on the consultation document *Te Pūtahi Ladies Mile Masterplan*.

### **Use of space and infrastructure**

PHS supports the Te Pūtahi Ladies Mile Design Principles and Key Moves. The already strained infrastructure connecting Ladies Mile to Frankton/Queenstown Centre through the bottleneck of the Shotover Bridge needs to be considered before development proceeds. For example, expanding the bridge to include a dedicated bus lane, protected cycle lane, and pedestrian walkway could be considered. We realise that Waka Kotahi will need to be part of the conversation as the bridge is part of the State Highway network.

In principle, PHS supports high-density housing to promote environmental sustainability, housing affordability, warm homes, and social connectedness. However, infrastructure challenges and acceptability to the local community must be considered at this location.

We recommend that any new housing developments in the area include a significant proportion of designated affordable housing options as a part of Principle 6: *Do density well, provide quality & diverse housing*.

PHS supports more mixed use spaces, such as adding grocery stores and other shops, so that people can run errands locally without going over the Shotover Bridge. This also promotes active transport opportunities as well as social connectedness.

We recommend that new community centres promote a smokefree/vapefree policy to reduce air pollution and litter and protect children and community members from the harmful health impacts of second-hand smoke inhalation, and to help any smokers quit.

**Active and public transport**

PHS is happy to see the provision of protected walkways and bicycle lanes on p.54. The promotion of safe, appealing spaces for active transport will help improve community well-being.

PHS would like to see further plans to bolster the connection of Ladies Mile to Frankton and Queenstown Centre via improved active transport solutions, which would also help to alleviate traffic concerns on the Shotover Bridge.

PHS is in favour of dedicated bus lanes. However, the presence of a single-lane bridge between Ladies Mile and Frankton/Queenstown will present a challenge.

Thank you for the opportunity to provide feedback on this consultation document.

We wish to be heard regarding this submission.

Yours sincerely



Sierra Alef-Defoe  
Health Promotion Advisor

28 May 2021

Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions Feedback  
Queenstown Lakes District Council  
via email: [letstalk@qldc.govt.nz](mailto:letstalk@qldc.govt.nz)

To whom it may concern

**Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions: Feedback of Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited**

Thank you for the opportunity to provide a feedback on the Te Pūtahi Ladies Mile Draft Masterplan and Planning Provisions. This feedback is on behalf of Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited (**the Syndicate**).

**Summary of feedback**

The Syndicate owns land at Ladies Mile within the masterplan area. The Syndicate supports the concept of master-planning for Ladies Mile, however it does not support the current masterplan as drawn.

**Matters supported**

- Draft zoning map that shows the Syndicate's land zoned a mix of high and medium density residential.
- The general approach of the design principles.
- Building heights depicted in the masterplan.
- Use of the existing planning framework with adaptations as required to recognise the higher density of residential development to be enabled at Ladies Mile.

**Matters not supported**

- The location of the high school.
- Small area of residential on the Syndicate's land.
- Masterplan layout in the vicinity of the town centre.
- Limits on overall yield.
- Prescriptive nature of several of the rules/standards.
- Activity status for non-compliance with several of the rules/standards.

The Syndicate's preference is for the masterplan to be redrafted to align with earlier consultation options A and B. Further detail on these matters are expanded on below.

**Introduction**

The Syndicate owns 4.5 hectares of land at 497 Frankton-Ladies Mile Highway, shown in Figure 1 below. The Syndicate has owned the land since November 2018 and it is currently used as a boutique visitor accommodation lodge.



**Figure 1: 497 Frankton-Ladies Mile Highway**

The Syndicate is committed to developing this site for medium and high density housing in the short to medium term. Developing the land in this way will contribute to the overall delivery of the Council's goals for urbanising Ladies Mile.

The Syndicate supports the Council's initiative of master-planning this area, and has engaged with the Council's team on this process, including providing feedback on the draft Ladies Mile Masterplan options formally via letter and informally in meetings with the Ladies Mile Consortium team.

**Feedback on Te Pūtahi Ladies Mile Draft Masterplan**

The Syndicate does not support the masterplan in its current form. The key areas of concern are:

1. The location of the high school.
2. The lack of residential land shown on the masterplan at 497 Ladies Mile Highway.

An overlay of the draft masterplan and the Syndicate's land is shown in Figure 2 below.



**Figure 2: 497 Frankton-Ladies Mile Highway (shown by red border) overlaid on snip from the draft masterplan**

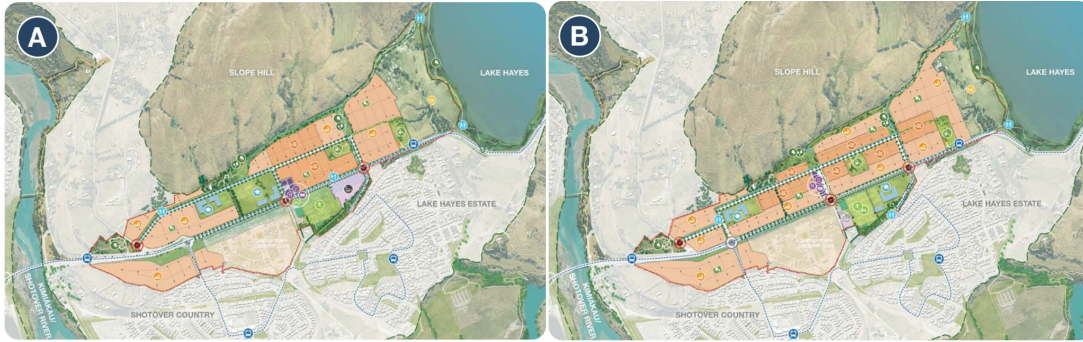
### ***High school location***

As Figure 2 shows, the draft masterplan shows the high school and associated open space located over the majority of the Syndicate's site, with a small area of residential land in the northern part of the site. This is a significant change from the previous iterations of the draft masterplan that showed a mix of medium and high density residential in this area.

Given the plans outlined above in relation to the Syndicate's development intentions for its site (that have been conveyed to the Council in previous feedback), the Syndicate is disappointed to see the high school located in this location. The Syndicate will not be able to deliver its intended medium-high density residential development if this land is taken for school purposes. The Syndicate seeks that the high school be moved from its land.

Previous consultation versions of the masterplan showed the high school further to the east (Option A) or across the road at 516 Frankton Ladies Mile Highway (Option B). The Syndicate considers 516 Frankton Ladies Mile Highway to be the most appropriate and practical site as the high school can be collocated with the bus interchange and playing fields. In terms of the specifics of Option B in relation to the Syndicate's land, this is not supported due to the location of a park over part of its land and consequential impact on residential development feasibility. The Syndicate therefore provided feedback in support of Option A during the earlier consultation period and this masterplan is still supported by the Syndicate.





**Figure 3: Earlier versions of the masterplan – Public Open Days Masterplan Options A and B**

### ***Location of residential land***

The Syndicate requests that all of its land be shown as residential on the masterplan. Under the current masterplan, the residential part of its site equates to just over one hectare, or approximately 23%. Developing only one hectare significantly undermines the feasibility of any future development plan in terms of the economies of scale that would otherwise be achieved. The current masterplan therefore creates a risk that this part of the masterplan area will remain undeveloped. This is at odds with the overall intent of the masterplan and principles. As previously conveyed to Council in its submission on the draft Queenstown Lakes Spatial Plan, part of ‘unlocking’ the potential of the Ladies Mile area requires landowners who are motivated to deliver on the Council’s masterplan.

### ***Other matters***

#### ***Zoning***

The masterplan contains a draft zoning map, which shows the Syndicate’s land as a mix of high and medium density residential. The Syndicate supports this draft zoning. One of the key features noted on the zone map that forms part of the masterplan is that ‘zoning supports anticipated land use’. Given the Syndicate’s plans for residential development on the site, the Syndicate supports the mix of high and medium density zoning on its site as per this draft zoning map.

#### ***The town centre and surrounding land use***

In order for the town centre to be a successful and vibrant hub, it will require a critical mass of people living nearby. However, the town centre is currently adjoined by expansive stormwater and reserves/open space to north and east. The Syndicate considers it more appropriate to locate high density residential activity in and immediately adjacent to the centre to contribute to vibrancy. The high school and associated open space will not contribute to town centre vitality or vibrancy.

#### ***Design principles***

The Syndicate supports the seven design principles, and in particular Principle 6 ‘Do density well, provide quality and diverse housing’. The Syndicate considers Ladies Mile has the potential to provide a significant and unique contribution to much needed supply and diversity of housing in Queenstown. The built form outcomes and increased heights and densities over what is typically delivered in the wider Queenstown urban context is supported.

#### ***Height, setbacks and yield***

Syndicate seeks maximum flexibility for development. The Syndicate supports increasing the height beyond what is currently enabled by the PDP to 24.5 metres in high density areas and 13 metres in medium density areas.

The Syndicate does not support the 20 metre amenity access area and building restriction area adjoining State Highway 6. While this is a significant improvement on the current setback requirements, the Syndicate considers there are opportunities to further reduce this and still maintain the gateway environment of Ladies Mile. A reduction in this setback will assist in providing landowners by providing flexibility.

It is understood that the residential yield at Ladies Mile is limited by traffic and transport infrastructure constraints, including the capacity of the Shotover River bridge on State Highway 6. The Syndicate considers this issue must be addressed and transport challenges should not be the determinant of yield in this or any other location.

#### **Feedback on the Draft Planning Provisions**

The Syndicate agrees is its most efficient and effective to utilise the existing PDP provisions, with some adaptations to ensure that the unique outcomes anticipated at Ladies Mile can be delivered. The Syndicate is generally supportive of the relatively enabling draft provisions. This includes the additional height allowance for the medium and high density zones, removal of minimum lot size, and exemption from the minimum dimension requirement, for example.

In relation to height, the Syndicate notes that the structure plan building heights plan does not appear to align with the height mapping set out in the draft masterplan (several areas that should be subject to the 24.5m height limit are shown as black (this may be a printing error due to the additional hatching shown)).

The Syndicate considers there are other opportunities to make the provisions more enabling. This includes a controlled activity status for development in accordance with the structure plan (as opposed to restricted discretionary), and increasing the maximum building coverage standard.

The Syndicate does not support the minimum average density requirement (40 units per hectare) and minimum number of stories, as the preferred density will be driven by market demand and what is feasible to achieve. The Syndicate does not support the activity status of non-complying to breach the standard and considers restricted discretionary activity status to be more appropriate. Matters of discretion could include the extent of infringement, size of units, opportunity to make up the shortfall elsewhere, viability of achieving the 40 unit average, and the like.

While infrastructure delivery and land use planning must be integrated, as noted earlier, the Syndicate does not agree that infrastructure constraints should be the driver of residential yield in such a critical location. To this end, the Syndicate does not support the inclusion of provisions that development cannot proceed until various infrastructure items are provided for (e.g. Rules 7.5.20, 8.5.41 and 9.5.36).

With regard to activity statuses, as noted, the Syndicate would prefer to see as much flexibility built into the provisions as possible to facilitate development. This would be better achieved by having restricted discretionary activity status for breach to standards throughout the provisions, rather than non-complying.

**Summary**

The Syndicate supports the Council's initiative to masterplan Ladies Mile. The Syndicate does not support the current location of the high school, and requests that the masterplan be amended to show high and medium density residential development over the entirety of its site at 497 Ladies Mile Highway. The Syndicate supports the overall enabling direction of the draft planning provisions, and considers these could be further developed to ensure maximum flexibility for motivated landowners to deliver much needed residential capacity and choice in Queenstown.

Please contact me should you require further information or clarification of the matters raised in this feedback.

Yours sincerely

**Ladies Mile Property Syndicate Limited Partnership and E&O Property Syndication Limited**



**Peter McConnell**

General Manager: Performance & Planning  
On behalf of E+O Property Syndication Limited

**Contact**

Please contact E+O Property Syndication Limited for more information.

Graeme Gunthorp  
Charles Beale



**Submission on Te Pūtahi Ladies Mile Masterplan**

To: Queenstown Lakes District Council  
letstalk@qldc.govt.nz

Submitter: Maryhill Limited  
[REDACTED]

This submission is made on behalf of Maryhill Limited (**Submitter**) in respect of the Te Pūtahi Ladies Mile Masterplan.

The Submitter could not gain an advantage in trade competition through this submission (clause 6(4) Schedule 1 Resource Management Act 1991 (**RMA**)).

This submission has been prepared in accordance with the requirements of clause 6, Schedule 1, RMA, in anticipation of the Te Pūtahi Ladies Mile Masterplan and draft planning provisions forming a variation to the QLDC Proposed District Plan. It is the intention of the Submitter that this submission be accepted as both feedback to this consultation process, as well as any future formal RMA notification process under Schedule 1 relating to the Te Pūtahi Ladies Mile Masterplan.

The Submitter has interests in land within, and adjacent to, the Pūtahi Ladies Mile Masterplan area, outlined in red on the zoning map attached as **Appendix A**.

**Parts of the masterplan and planning provisions that this submission relates to:**

- 1 The Submitter is interested in the proposal (masterplan and draft planning provisions) in its entirety.
- 2 Without limiting the generality of the above, the specific provisions that this submission relates to are:
  - (a) Chapter 27 – subdivision and development;
  - (b) Te Pūtahi Ladies Mile Masterplan, building heights plan, and zoning maps;
  - (c) Chapter 8 Medium Density Residential;
  - (d) Chapter 9 – High density Residential;
  - (e) Chapter 15 – Local Shopping Centre Zone;
  - (f) Chapter 19B Te Pūtahi Ladies Mile Town Centre;
  - (g) Chapter 29 – Transport;
- 3 The Submitter is opposed to the Te Pūtahi Ladies Mile Masterplan and associated draft planning provisions in their entirety. Although specific recommendations have been suggested to these planning provisions as set out in the below submission, the Submitter is interested in, and submits on, the entirety of the proposal.

**Reasons for submission:**

- 4 Specific recommendations to the notified chapter provisions have been set out below, however the objectives of the Submitter in making these recommendations are summarised as follows:

**Process:**

- 5 The Submitter is generally concerned with the proposed intensity of development anticipated in the Structure plan. In particular, it is considered this does not represent community, adjacent and occupying landowner, views despite significant 'consultation' expended to date.
- 6 The intensity of development proposed is far beyond that which is currently seen or anticipated in the District, and is likely to be at odds with the landscape within which the area is set, as well as the function of the Ladies Mile rural – urban gateway.
- 7 Despite significant Council planning evidence being presented in the course of District Plan hearings and Environment Court appeals, to the effect that there is 'surplus' land zoned for residential development across the District, and that this meets the needs of the NPS Urban development, the Masterplan seeks an intensity of residential development significantly greater than what community and landowners have sought, or what is supported by NZTA.
- 8 There continues to be no acceptance of the lack of infrastructure (particularly roading) to provide for the proposed level of development / density in the Masterplan.
- 9 Limited provisions have been included to address inclusionary zoning objectives; if the intention is to provide for a separate plan change or variation introducing such objectives, including any land contribution requirements through development, these should be progressed in combination with the rezoning of this land.

**Zoning map and structure plan area:**

- 10 The northern boundary of the structure plan outline is sought to be amended to follow a refined ONL identification, based upon a finer grained assessment of the topography and values of this landscape unit. The extent of the proposed Structure Plan / Zoning Map should follow this refined boundary. This ONL is yet to be tested through the District Plan Review process and is not based upon a detailed landscape assessment. Within this location there is potentially further suitable land for further residential and lifestyle development, which is consistent with the intentions of the Te Pūtahi Ladies Mile Masterplan process. The Submitter seeks the ONL be amended and that developable land outside of the amended ONL be rezoned for either rural living (residential or precinct), or LDR, LLR, or included in the Masterplan if the process is to continue to RMA notification. The Submitter also seeks that the UGB be amended to align with the amended ONL.
- 11 The Zoning map is opposed on the basis of the level of prescription provided across the different areas of the Masterplan area. In particular, the densities associated with each of the LDR, MDR, and HDR are opposed, along with the anticipated variation of development of different activities in the local Shopping and Town centre Zones.
- 12 The Structure Plan is opposed on the basis of the level of prescription provided across different areas of the Masterplan area. It is unrealistic to expect that the multitude of landowners across the Masterplan area will be able to achieve this level of detail through multiple development / consent applications in the future. The prescription will not provide for creative and high quality design outcomes, which respond to evolving community desires and needs. In particular, the structure plan details which are opposed include:

- (i) Identified infrastructure requirements which do not take into account landowner boundaries or commitments to development, such as roading, stormwater, underpass and active links;
  - (ii) Open space, tree protection and stormwater management areas – which are not based upon a detailed effects assessment as to the needs of these to be retained, their size or location. There has also been no acknowledgement as to what management structures will be in place in the future, or what compensation will be made to landowners who are subject to these overlays, which will effectively prohibit any development or use of this land.
  - (iii) Identified sub-areas which are based upon an arbitrary grid-like pattern of development will not provide for creative or responsive urban planning, or take into account different land ownership needs and aspirations.
  - (iv) Lack of integration with adjacent rural and rural living development / land uses. The submitters are concerned with the significant increase in intensity of urban development proposed adjacent to currently operational farm land on Slope Hill. The increase in pedestrian movements, traffic, and other occupations will make continued farming on this land impossible for security, safety and reverse sensitivity reasons. A more varied form of densities, including rural living and LLR / LDR development in the Masterplan area will more appropriately reflect the existing high quality patterns of rural living development and adjacent residential subdivisions (Shotover Country and Lake Hayes Estate).
- 13 The proposed building height structure plan is opposed on the basis of the significant heights that are anticipated across the structure plan area. These heights are considered to be inconsistent with local amenity and not reflect community needs, culture, and history.
- 14 It is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development. Such integration is lacking across all of the amended plan chapters
- 15 The Submitter seeks that the above plans be deleted and that the rezoning of the Submitter land, and surrounding land within the Masterplan be a mixture of densities ranging between rural residential / precinct, LLR, LDR, and MDR.

**Chapter 27 – Subdivision:**

- 16 Provisions pertaining to requiring development be consistent with the structure plan are overly prescriptive and will not provide for a high quality design-led and responsive planning outcomes. Such provisions include, 27.9.8.1b, c, d, e. The requirement to achieve an expected density within each zone or sub area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices (27.9.8.1(f)) should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.
- 17 It is considered that a much more simplified regime for subdivision can be achieved through a concise statement of objectives, policies, and assessment matters which seeks to achieve an integrated and high quality mixed urban / residential outcome for the area.

- 18 The Submitters seek that subdivision to densities requested by the Submitter are controlled or restricted discretionary, with matters of control limited to those currently included in the LDR, LLR, MDR and rural living Zones of the PDP.
- 19 There is a lack of acknowledgement, and integration with, existing rural lifestyle / rural residential and rural land adjacent to Ladies Mile. The effects on these owners and the existing high quality developments need to be considered and responded to in future development.

**Chapter 7 – Low Density Residential:**

- 20 7.5.20 – infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 21 The Submitters request that these requirements be deleted, and if replaced, are left to general controls in the subdivision chapter as to requirements for the upgrade and install of requisite infrastructure. In practice, necessary infrastructure can be designed and implemented on a development needs basis, and with private agreements between landowners if need be. The current level of prescription will have the perverse outcome of stagnating residential development.

**Chapter 8 – Medium Density residential:**

- 22 Objective 8.2.12 – is unclear in its current expression in that it is uncertain what 'greater' intensity and diversity of housing is being compared to (i.e. whether this is other zones, or other MDR zoned areas than Ladies Mile). The intention of greater 'intensity' and diversity of housing to achieve a modal transport shift is also opposed on the basis that this has been queried, and not supported by, the NZTA.
- 23 Policy 8.2.12.1 – is opposed on the basis of the prescriptive wording used to achieve urban design outcomes. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom-line approach. This could have the adverse consequence of limiting development options, timeliness, and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.
- 24 Policy 8.2.13 is supported, subject to deleting reference to 'urban', and also referencing adjacent rural lifestyle, rural residential and rural land. Given that existing Shotover Country and Lake Hayes Estate Submissions are residential. The integration with those existing communities necessitates a lower overall density and intensity of development at Ladies Mile than is currently anticipated in the draft masterplan. Furthermore, it is critical to consider integration with adjacent rural lifestyle, rural residential, and rural land uses (such as Threepwood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development.
- 25 Policies 8.2.13.1 – 8.2.13.3, Rule 8.4.28, Rule 8.5.20 – requirements to adhere to the structure plan, and associated non-complying activity status for non-conformity, are opposed on the basis these are overly prescriptive, will have the perverse effect of delaying development, and will not encourage innovative design led outcomes.

- 26 Infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 27 Rule 8.5.21, 8.5.22, 8.5.24, 8.5.26, 8.5.27, 8.5.29, – density, building coverage, heights and outdoor living spaces – these provisions are generally opposed for the reasons as outlined above, opposing the overall increased intensity of development. A minimum density to be achieved (at 40 dwellings per hectare) is significantly greater than what is anticipated in this location, and there has been no evidence provided that this is what the market is seeking. No evidence has been provided to support whether this type of development is feasible or affordable and it is considered it will have the perverse outcome of delaying development of affordable and high quality housing.
- 28 Rule 8.5.41 – infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 29 Assessment matters:
- (a) *8.7.a context and character* – should equally refer to integration with and responding sensitively to adjacent development (which includes rural land uses, rural living, and low and medium density residential subdivisions).
  - (b) *8.7f sustainability and resilience* – while the intention of this assessment matter as an aspirational goal is supported, the current wording does not take into account other alternative contributions to sustainable outcomes such as creation of open space and reserve contributions that are achieved through development.

### **Chapter 9 – High Density Residential:**

- 30 Objective 9.2.9 - is unclear in its current expression in that it is uncertain what 'greater' intensity and diversity of housing is being compared to (i.e. whether this is other zones, or other HDR zoned areas than Ladies Mile). The intention of greater 'intensity' and diversity of housing to achieve a modal transport shift is also opposed on the basis that this has been queried, and not supported by, the NZTA.
- 31 Policies 9.2.9.1 - is opposed on the basis of the prescriptive wording used to achieve urban design outcomes. Words such as 'require' and 'avoid' have been interpreted in the courts as to mean a bottom line approach. This could have the adverse consequence of limiting development options, timeliness and responding to community and market demands. In particular, the avoidance of single detached residential units is opposed as this is a housing product suitable for families, renters, and worker accommodation, which are in demand across the District. Furthermore, developers / landowners may have experience in delivering this type of product to the market in an efficient and cost effective way, which further supports affordability and increases supply.
- 32 9.2.10 – 9.2.10.3 - Provisions pertaining to requiring development be consistent with the structure plan are overly prescriptive and will not provide for a high quality design-led and responsive planning outcomes. The requirement to achieve an expected density within each zone or sub



area through subdivision will have the adverse consequence of stymieing residential development. Requirements for achieving diverse housing choices should also be left to individual landowners and the market to decide; homogeneity in housing can in some cases lead to better design outcomes and cost effectiveness in subdivision.

- 33 Within the HDR provisions there is no acknowledgement of the need to integrate with adjacent rural lifestyle, rural residential and rural land uses (such as Threepwood and Slope Hill) given those land uses may be incompatible and affected significantly by, the currently proposed intensity of mixed urban and residential development. There should be further acknowledgement of a design response to, and integration with, existing residential subdivisions of Lake Hayes estate and Shotover Country.
- 34 Rules 9.4.21, 9.5.18, 9.5.19, 9.5.20, 9.5.23, 9.5.24, 9.5.25, 9.5.27, density, building coverage, heights and outdoor living spaces (etc) – these provisions are generally opposed for the reasons as outlined above, opposing the overall increased intensity of development. A minimum density to be achieved (at 70 residential units per hectare) is significantly greater than what is anticipated in this location, and there has been no evidence provided that this is what the market is seeking. No evidence has been provided to support whether this type of development is feasible or affordable and it is considered it will have the perverse outcome of delaying development of affordable and high quality housing.
- 35 9.5.36 –infrastructure required prior to development proceeding – this provision does not take into account the complexity of landownership, development interests, and relative contributions across the different development areas. It does not account fairly and equitably for the different levels of development anticipated across differing areas, and the corresponding contributions that should be made to different infrastructure, nor does it take into account past significant contributions of existing landowners.
- 36 9.7 Assessment matters
- (a) *9.7.a context and character* – should equally refer to integration with and responding sensitively to adjacent development (which includes rural land uses, rural living, and low and medium density residential subdivisions).
- (b) *9.7f sustainability and resilience* – while the intention of this assessment matter as an aspirational goal is supported, the current wording does not take into account other alternative contributions to sustainable outcomes such as creation of open space and reserve contributions that are achieved through development.

**Local Shopping Centre Zone and Te Putahi Ladies Mile Town Centre Zones:**

- 37 The Submitter supports some form of mixed use and commercial development within the Ladies Mile masterplan and generally in the locations identified. However given these zones are not over the Submitter's land, detailed submissions have not been provided on the draft planning provisions.
- 38 The general intention of the Submitter, and relief sought in respect of these zones is that:
- (a) Mixed commercial and local shopping centre activities are provided for, to the extent that these integrate with a lower density of development and respond sensitively to surrounding rural land and landscapes;
- (b) School, recreation and public amenity opportunities are provided for, but are not overly prescribed into the masterplan in terms of eventual locations and extent.

**Higher order provisions and consequential amendments:**

- 39 4.2.2.21(b) - References to urban, medium and high density residential development is opposed on the basis of the above submission; the Submitter seeks that a lower range of densities and mixed development opportunities be supported to enable greater supply and diversity of choice in the housing market. 4.2.2.21(d) and (e) Contribution to public transport as a preferred method of travel is unlikely to be able to be achieved through subdivision housing development and should therefore be deleted.

**Chapter 29 – Transport:**

- 40 Based on the contents of this submission, standalone dwellings and lower residential density is supported, therefore maximum parking spaces (Rule 29.5.14, 29.5.2X) which do not provide for even one parking space for a 1 bedroom apartment are unlikely to work in practice. Worker accommodation from the tourism sector is an area which is in shortage in the District, and many of those workers will not be able to work within Ladies Mile. The restrictions on parking and the anticipated lack of external movements over the Shotover Bridge will mean that worker accommodation for key sectors will continue to be in demand, and this rezoning will not alleviate such social pressures.

**Decision sought:**

- 41 The Submitter seeks the following decisions from the QLDC:
- (a) That the Te Putahi Ladies Mile Masterplan and associated draft planning provisions not be accepted by Councillors for further progression under any RMA planning process;
  - (b) In the alternative to the above, that the Council accept the suggestions and comments made in the above submission to be amended in the draft planning provisions and Masterplan following further consultation with landowners within the Masterplan area;
  - (c) Should the masterplan and draft planning provisions be refused for further consultation by Council, the Submitter seeks:
    - (i) The Ladies Mile Masterplan area be rezoned to a mixture of rural residential / precinct, LLR, low and medium density residential;
    - (ii) Rezoning takes into account and provides for the community needs of limited and small scale / sensitively designed supporting zoning such as commercial and local shopping centre zoning, plus education and recreational opportunities;
    - (iii) Any such rezoning take into account a realistic amount of additional residential development that is supported by NZTA and which provides for an equitable outcome of development shared across different landowners in the area;
    - (iv) Requirements for infrastructure upgrades be realistic and proportionate to the development proposed and take into account past contributions made by existing landowners;
    - (v) Affordable housing and development contribution requirements are realistic and equitable such as to not dissuade affordable and efficient development of the land to market;
    - (vi) Amendment of the ONL boundary at the base of Slope Hill such that developable land is included in the Masterplan and rezoned.

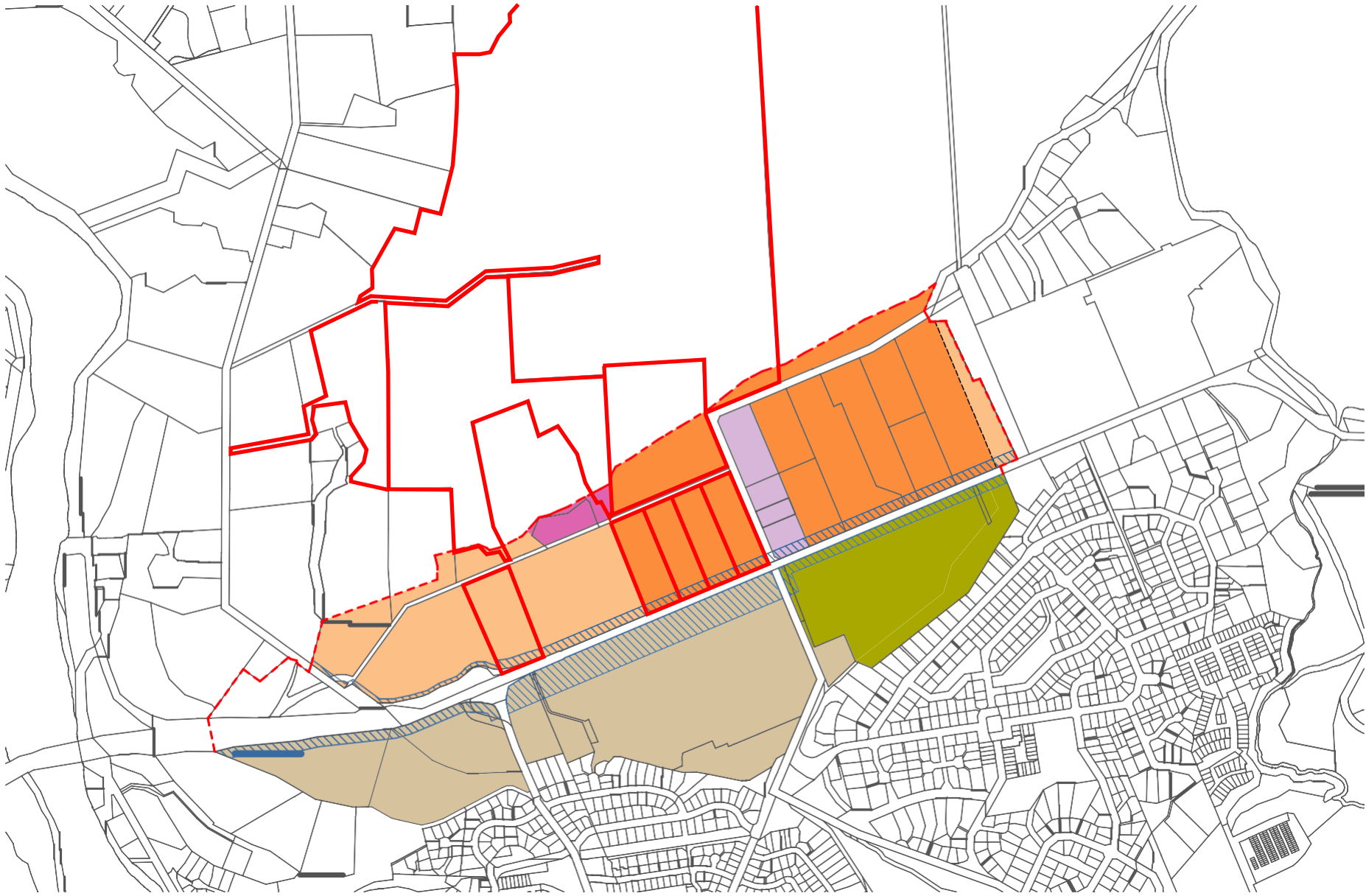
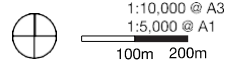
- (vii) Amendment of the UGB to align with the amended ONL.
  - (viii) Structure plan restrictions on development, such as infrastructure areas, protected trees and recreation, be equitably offset / compensated with landowners.
  - (d) Any further amendments to affordable and community housing contributions, or inclusionary zoning sought to be progressed through a planning variation or change should be progressed at the same time as this rezoning / master planning proposal.
  - (e) The Submitter seeks that Council progress the rezoning of this land under a fast track process through the RMA, such as a streamlined planning process, thereby enabling housing and community planning issues to be realised as soon as possible.
- 42 The Submitter wishes to be heard in support of this submission.
- 43 If others make a similar submission, the Submitter will consider presenting a joint case with them at the hearing.

28 May 2021



Maryhill Limited  
Signed by their duly authorised agents  
Anderson Lloyd  
Per: Maree Baker-Galloway  
Address for service: [REDACTED]

# Te Pūtahi Ladies Mile Zoning Plan



- Key**
- Urban Growth Boundary Extension
  - Building Restriction
  - Town Centre
  - Local Centre
  - High Density Residential
  - Medium Density Residential
  - Lower Density Residential
  - Open Space - Community Purposes

**Feedback on the Queenstown Lakes District Council's draft Te Pūtahi Ladies Mile Masterplan and draft Planning Provisions to the Proposed Queenstown Lakes District Plan for Te Pūtahi Ladies Mile**

To: Queenstown Lakes District Council

**Name of submitter: Ministry of Education ('the Ministry')**

Address for service: C/- Beca Ltd  
PO BOX 13960  
Christchurch 8141

Attention: Hugh Loughnan

Phone: [REDACTED]

Email: [REDACTED]

**This is the Ministry of Education's ('the Ministry') feedback on the draft Te Pūtahi Ladies Mile Masterplan and draft Planning Provisions to the Proposed Queenstown Lakes District Plan for Te Pūtahi Ladies Mile by the Queenstown Lakes District Council.**

The Ministry welcomes the opportunity to provide feedback on the draft Te Pūtahi Ladies Mile Masterplan (draft TPLMM) and draft Planning Provisions to the Proposed Queenstown Lakes District Plan (PDP) for Te Pūtahi Ladies Mile (draft DPP).

**Background**

The Ministry of Education is the Government's lead advisor on the New Zealand education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry assesses population changes, school roll fluctuations and other trends and challenges impacting on education provision at all levels of the education network to identify changing needs within the network so the Ministry can respond effectively.

The Ministry has responsibility not only for all State schools owned by the Crown, but also those State schools that are not owned by the Crown, such as designated character schools and State integrated schools. For the Crown owned State school this involves managing the existing property portfolio, upgrading and improving the portfolio, purchasing and constructing new property to meet increased demand, identifying and disposing of surplus State school sector property and managing teacher and caretaker housing.

The Ministry is therefore a considerable stakeholder in terms of activities that may impact on existing and future educational facilities and assets in the Queenstown Lakes district.

**The draft TPLMM relevance to Ministry property:**

The draft TPLMM sets out the spatial framework and direction for planning for growth in Te Pūtahi Ladies Mile area. The Ministry understands that the development is anticipated to enable up to potentially 2400 households. Of relevance to the Ministry is that to accommodate the anticipated growth from the proposed development and wider catchment, a new primary and secondary school site will be required. In this regard, the Ministry's expectation is that the secondary school will be required around 2030, with the primary school required around 2023, albeit dependent on the rate and growth of development within Ladies Mile.

In recognition of these requirements, the Ministry has undertaken a site identification and evaluation exercise for both schools, the key outcomes and findings of which have been discussed with the Ladies Mile Consortium during previous consultation. This evaluation process has involved a multi-criteria analysis methodology, with several sites evaluated across Ladies Mile against a broad range of criteria, including matters relating to technical ground conditions and natural hazards, location and proximity to student catchment, ease of acquisition, transportation, infrastructure, site constraints, social impacts and opportunities for co-location and shared facilities. The overall conclusion from the Ministry's evaluation was that the Ladies Mile locale displays a number of attributes that would support the provision of appropriate primary and secondary school facilities in a range of locations.

Overall, the Ministry is generally supportive of the aims of the draft TPLMM and commends the inclusion of educational facilities. The Ministry, however, considers that there are some potential co-location opportunities that should be explored in relation to the site at 516 Frankton Ladies Mile Highway owned by Queenstown Lakes District Council (QLDC). The Ministry understands that this land is indicated in the draft TPLMM as a Community and Sports Hub (including playing fields). The Ministry recognises the desire and necessity for community and recreation facilities in the area, however, considers that such facilities can be feasibly established on the site in conjunction with a secondary school. In this regard, the site would enable an opportunity to establish a wide range of accessible and quality facilities and activities for use by the community and students, as well as provide for the efficient utilisation of land across Ladies Mile.

The Ministry is increasingly embracing the opportunity for efficiencies and sharing public facilities, with a number of examples of co-location of facilities undertaken between the Ministry and other local authorities across the country. These include:

- The Peak Performance Centre, a new indoor sports shared facility between Rototuna Junior and Senior High schools and the Hamilton City Council,
- The Upper Riccarton Library, a shared community and school library operated by Christchurch City Libraries in collaboration with Riccarton High School and
- A current opportunity between Marlborough District Council and Marlborough Boys and Marlborough Girls College's which seeks to share recreational facilities.

In addition, Rototuna Junior and Senior High schools as well as Rolleston College are also located adjacent to council facilities; Rototuna Sports Park and Foster Park, respectively. It is considered that both from a community perspective and the Ministry's perspective, there are considerable benefits to co-location and shared facilities.

**The Ministry's feedback:**

Overall, the Ministry is generally supportive of the aims of the draft TPLMM and commends the inclusion of educational facilities.

However, the Ministry wishes to emphasise and express the opportunity of, and willingness to, investigate co-location of facilities with QLDC in relation to the site at 516 Frankton Ladies Mile Highway.

The Ministry's policies regarding its approach to working with schools, local authorities and other parties to establish agreements for sharing school facilities recognise that:

- The Ministry supports community use of school facilities where there is a public interest in doing so, in order to rationalise facility funding and reduce duplication and associated costs.
- The Ministry aims to support wider Government goals through provision of facilities for shared community use (e.g. health and wellbeing programmes; response to civil emergencies).
- There are opportunities for shared use that should be considered jointly by both the Ministry and school Board of Trustees, to ensure that the best outcome for schools and the wider community is investigated across the wider school network.

With regard to the draft DPP, and in order to not foreclose a co-location opportunity in relation to the site at 516 Frankton Ladies Mile Highway, the Ministry would support specific provision for education facilities and buildings (in much the same way as the specific provision for clubrooms within the Open Space and Recreation –Community Purposes Zone at Ladies Mile). This approach would also provide a consistent zone framework, noting that Objective 38.7.1 and its supporting policies all take an enabling view towards 'community activities' (and subsequently educational activities) within the Open Space and Recreation Zone.

The Ministry looks forward to continuing to work closely with the Ladies Mile Consortium and QLDC to enable the development of educational facilities and provide for efficient land uses throughout the Queenstown Lakes District.

Should you have any more queries please do not hesitate to contact the undersigned as consultant to the Ministry.



---

Hugh Loughnan  
Planner – Beca Ltd  
(Consultant to the Ministry of Education)

**Date:** 28/05/2021

# Submission to the draft Te Pūtahi Ladies Mile master plan

FlightPlan2050



June 2021

We would first like to acknowledge the considerable amount of excellent work and expertise by many people that has delivered this draft for our consideration.

Thank you for the opportunity to submit to the draft Te Pūtahi Ladies Mile master plan.

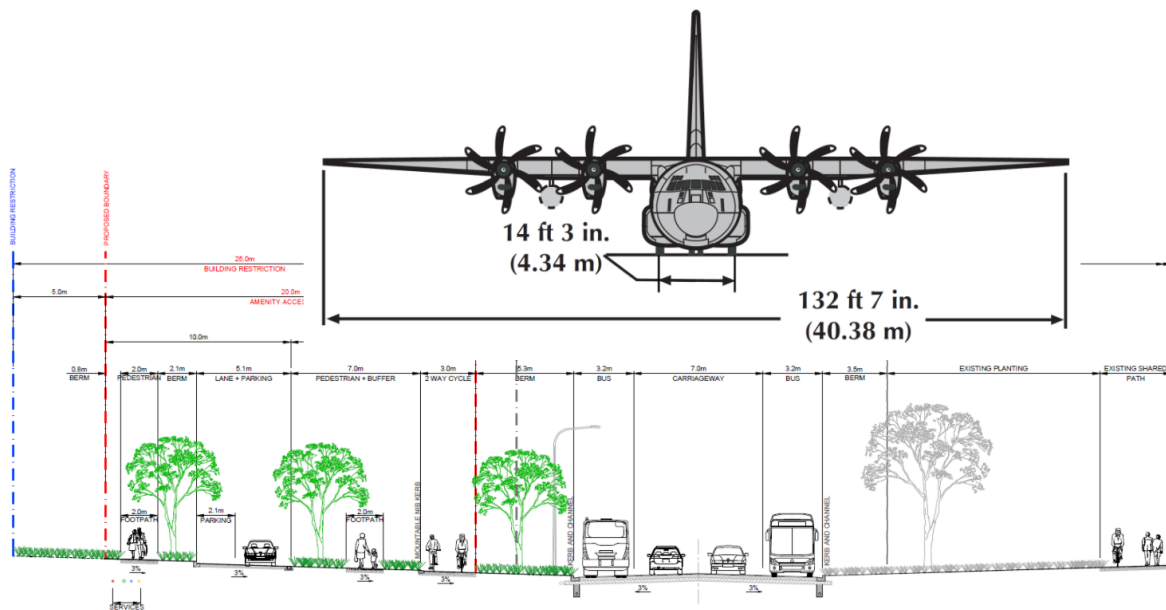
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*We submit that:*

*The State Highway 6 landscape plan must specifically ensure the future potential use of this roadway as a runway for Hercules C130J aircraft during times of civil emergency. This would require the landscape plan to use only plants that could be restricted to 2 m height within 30 m of the road centreline, and to 4 m for the remainder up to 40 m from the road centreline.*

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The following diagram illustrates the proportionate size of an NZ RAF Hercules C130J relative to the cross-section of State Highway 6 shown on page 54 of the draft Te Pūtahi Ladies Mile master plan. The 13.4 m wide, sealed carriageway is easily sufficient to accommodate the 4.34 m wide undercarriage of Hercules aircraft flown by experienced Air Force pilots.





## Commentary

In support of this submission, we draw your attention to the following:

### 1. **Planning and infrastructure for civil emergency is crucial**

The district faces real and imminent risk of a substantial seismic event and must plan accordingly. There is a 75% probability of an earthquake measuring 8 or more on the Richter scale breaking the full length of the Alpine Fault within the next 50 years (AF8.org).

Such an event would likely cause substantial damage to the road network that connects the Wakatipu to outside regions and, with extensive damage likely throughout the South Island, it may take considerable time before these road connections were reinstated.

It is crucial that all district planning include at its core the need to strengthen community resilience to manage such an event.

Foresight and thoughtful planning in the Ladies Mile master plan could substantially increase the district's resilience and capacity during a civil emergency – with no extra cost.

### 2. **High-volume airlift capacity is essential during civil emergency**

The risk that damaged highways could physically isolate the Wakatipu from the land transport network means it must ensure it can retain high-volume airlift capacity during civil emergency.

The Wakatipu population includes tens of thousands of temporary visitors who would need to be evacuated in the event of a catastrophic civil emergency. This, together with the need to maintain an effective supply chain for the remaining population, means we must ensure we retain the capacity for high-volume airlift to move people and supplies to and from the basin until the connecting roads become passable.



### 3. **Too risky to rely solely on Queenstown Airport**

Reliance solely on Queenstown Airport for this emergency capacity presents too great a risk in both the median and long-term, for the following reasons:

- a. The Queenstown Airport runway could itself be damaged and rendered unsuitable for use following a seismic event. This would be compounded by potential lack of

appropriate construction machinery able to easily access Frankton Flats.

- b. The three bridges currently spanning the Shotover River – Edith Cavell, historic Shotover Bridge and the State Highway 6 Bridge – could be damaged and unable to be used for a period. This would leave all those to the east of the Shotover River isolated. So even if the Queenstown Airport runway were usable, there would be substantial advantage from the capacity to airlift people and supplies using Hercules from Ladies Mile.
- c. There is potential that the runway at Queenstown Airport could be closed sometime in the future with the area rezoned high density residential, thus removing the existing fixed-wing airlift capability.

While current local political leadership staunchly opposes such a move, ideas and circumstances change over time. Continued population growth in the region combined with a new regional airport near Tarras may make the comprehensive urban development of Frankton Flats inevitable. Multiple events over the past 2 years, as outlined in the attached appendix, make the future closure of Queenstown Airport increasingly likely, even in the medium term of 1 or 2 decades.

This potential outcome presents a real and serious risk for long-term resilience planning if there are no alternative emergency runway options available.

#### 4. **Most cost-effective emergency runway**

The Ladies Mile section of State Highway 6 could provide emergency runway capacity at a cost that would be substantially lower than any alternative. Indeed, with foresight and planning, the emergency runway capacity could be achieved at little or no additional cost than the existing baseline of currently programmed upgrades and maintenance.

- a. The current plan already includes a 4-lane highway that's both wide enough and built to specifications more than that needed for Hercules C130J aircraft.
- b. The adaptations necessary to enable emergency runway use, such as ability to easily remove roundabouts and lower streetlights and signage to the ground, are easily achieved with simple engineering solutions that would add little to their design or installation cost.
- c. Even if not designed and installed at the outset, roundabouts and streetlights can be modified in subsequent upgrades at relatively low cost.

#### 5. **Ladies Mile is the best location**

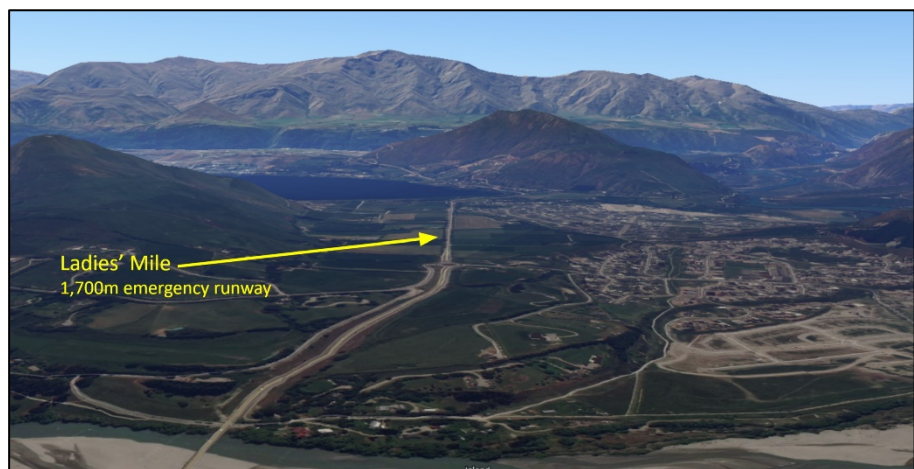
The Ladies Mile section of State Highway 6 offers the best location in the Wakatipu Basin for an emergency civil defence runway, for the following reasons:

##### a. **Best airstrip**

It offers the most suitable characteristics for aircraft.

- i. Its location in the middle of the Basin provides the least obstructed landing and takeoff flight paths, important given the district's challenging topography.

- ii. The substantial flat surrounding land provides good reference for pilots to manage their landing approach.
- iii. The local wind profile is more stable and predictable than most other locations, including Queenstown Airport. The east-west orientation aligns well with the predominant westerly wind.
- iv. The land is consistently flat with steady gradient along the length of road.
- v. The Ladies Mile state highway is the widest and strongest sealed road in the district.
- vi. The Ladies Mile provides ample length for a civil emergency runway. A Hercules C-130J can take off in 945 m and land within 915 m, well within the 1576 m length from the Stalker Road roundabout to McDowell Drive. It needs a road-width of just 9.5m to turn around.



**b. Best emergency infrastructure**

With the existing Lake Hayes Estate, Shotover Country and new Ladies Mile urban developments, the infrastructure surrounding Ladies Mile would make it the best location for a civil emergency air strip.

- i. The proposed community hub and sports facilities to the south side of the highway, primary and high schools to the north will be publicly owned amenities that would provide crucial infrastructure for civil defence emergency management.
- ii. The Wakatipu Medical Centre is also just a stone's throw away.
- iii. Such infrastructure is essential in the management of people, equipment and supplies in times of civil emergency. The halls, gymnasiums, classrooms, technology networks, communication centres, kitchens, hospital and other facilities would be readymade gathering places, distribution centres, emergency accommodation, food kitchens and command centres.
- iv. These facilities and the emergency air strip would all be within walking distance of the substantial urban population surrounding them and therefore not reliant on vehicular transport or road networks which could

have been damaged by the earthquake.

- v. That all these facilities will be publicly owned means they can easily be incorporated within civil emergency planning.

- c. **Central**

Located centrally in the Basin, this area has good road connectivity within the basin and would be accessible to many.

6. **No cost or compromise needed**

Our submission presents no cost or compromise to the intended objectives of the Ladies Mile master plan. The landscaping of the State Highway 6 corridor at Ladies Mile is a question only of style, not of substance.

- a. **No Cost**

Choosing an alternative landscape plan would not add to development or construction cost. Nor would it detract from or deflate in any way the private, community or public development objectives of the Ladies Mile subdivision. It would not inhibit or restrict any of the proposed development, diminish the financial returns, public or private, nor compromise any of the proposed activities, facilities or infrastructure.

- b. **Excellent alternative landscape designs are possible**

Our submission relates only to the landscape plan for State Highway 6. This is a question of style and look, and a range of different designs and plant types could equally satisfy the project aspirations for this space.

We accept that a tree-lined boulevard could be attractive but, we argue, no more attractive than could otherwise be achieved with a thoughtful design based on low growing plants. The landscape design of Jacks Point is an example of an alternative approach well matched to the district's outstanding natural environment. An outstanding design using non-native shrubbery could also work extremely well.

- c. **Low shrubs could be better than trees**

It could be argued that low growing shrubs would be preferable to a tree-lined avenue in this transport corridor as their substantial foliage at normal eyelevel could more effectively shield and separate the active transport trails from highway traffic than could a row of widely spaced tree trunks.

The low height of shrubs would also better enable the views from the roadway to the Remarkables as is identified in the "Views and Arrival" map on page 26 of the draft masterplan.

- d. **Tree-lined avenues could still be a feature**

Tree-lined avenues could remain a distinctive characteristic of this urban area even if not included along the State Highway 6 corridor. The three major roads shown on the master plan running perpendicular to Ladies Mile, including Howards Drive, could feature boulevard-style rows of trees extending both ways from the highway.

Indeed, landscaping these three linking roads as tree-lined boulevards would accentuate the north-south axis to better enhance the intra-urban connectivity between the Ladies Mile to the north and Lake Hayes Estate and Shotover Country to the south. While strengthening the intra-urban connections, these north-south oriented tree-lined avenues would also help diminish the negative effects of State Highway 6 cutting through and separating these urban centres.

**7. Trees prevent potential use as emergency runway**

A tree-lined avenue is incompatible with landing aircraft. While it is possible to achieve all the aspirations and outcomes of the Ladies Mile master plan without using trees in the state Highway 6 landscaping, planting such trees now would almost certainly prevent the future use of this roadway as an emergency runway.

Once an avenue of trees was in place, it would be almost impossible in the face of public sentiment to have them removed. Some may suggest this indicates the importance of trees, something we don't dispute. But this human need could be as easily and appropriately satisfied with trees planted on the north-south running roads that link the urban settlements either side of the state highway rather than being used to emphasise the highway that separates them.



PERFORMING A TACTICAL LANDING ON HIGHWAY RWY11 AT KOKSIJDE IN BLEGIUM, SEPT 2006

**8. There are trees there already**

Our submission does not ask you to remove at this stage the existing trees within the State Highway 6 landscape area. We accept that would be a conversation for another time. But we argue that the existence of trees already within the State Highway 6 landscape area should not be a reason or excuse to add more.

In the future, the prospect of a well-designed landscape plan together with the need for critical emergency infrastructure could achieve broad public acceptance for the eventual removal of the existing mature trees. Particularly if attractive new planting of shrubbery had become established.

But if new trees are added and allowed to mature, it will become increasingly difficult to have public agreement for their removal. The young trees already planted within the past 1 or 2 years should be removed as soon as possible. These could be transplanted to other areas, such as Howards Drive.

**9. Choice to obstruct or to enable**

A decision to plant trees as part of State Highway 6 landscaping along Ladies Mile is, we suggest, a decision to actively prevent its future use as a runway during times of civil emergency.

Such a decision should not be taken lightly. Given that alternative landscape designs could fully satisfy the aspirations for the Ladies Mile master plan and the potential value of the road as an emergency runway, then a determination to insist on trees alongside this section of the state highway could be seen as intentional sabotage of that future capacity.

**10. Essential risk management**

Good planning must manage risk. In this case, we have the future certainty of an AF8 seismic event which presents a range of risks. These are:

- a. the earthquake could seriously damage the highway network and isolate the Wakatipu for an indefinite period,
- b. Queenstown Airport runway could be unusable for a period,
- c. bridges across the Shotover River could be unusable for a period, isolating all the people to the east of the river.

In addition to these risks, there is the risk that Queenstown Airport's runway could, at some time in the future, be closed to allow intensive urban development of Frankton Flats. This is a risk that some would seek to minimise, or even deny. To help validate the substance of this risk, we have appended to this submission a report that addresses the credibility of such a scenario.

A decision to not use trees in the State Highway 6 landscape area is an effective strategy to mitigate all these risks.

At FlightPlan2050 we advocate for the fully integrated urban development of Frankton Flats, with the necessary relocation of scheduled air services to CIAL's proposed new airport near Tarras. In this submission, however, we do not ask you to support or endorse that proposal. The arguments we have presented above are themselves sufficient to conclude that a tree-lined avenue would be an inappropriate landscape plan for the State Highway 6 corridor at Ladies Mile.

Thank you for your consideration.

Sincerely,

John Hilhorst on behalf of FlightPlan2050

# Appendix

## 1 Is the alternative airport scenario credible?

*If it were highly unlikely that Queenstown Airport would ever be relocated, then it would be reasonable for planners to ignore CIAL's Tarras proposal and its potential impact on Queenstown Airport, the district's infrastructure and future planning.*

*But this is not the case. The likelihood of Queenstown Airport eventually being closed for all but VTOL has increased substantially over the past two years. The decision whether to relocate the airport is almost wholly a political one that is far from impossible, even in the near term.*

### 1.1 Hanging on to the old ways

The refusal to consider or assess the relocation of Queenstown Airport results from incumbent inertia controlling the political process. As such, it is open to change at every electoral cycle, is susceptible to public opinion and influenced by new information, all of which are near-term events that fall well within the timeframe of most planning horizons.

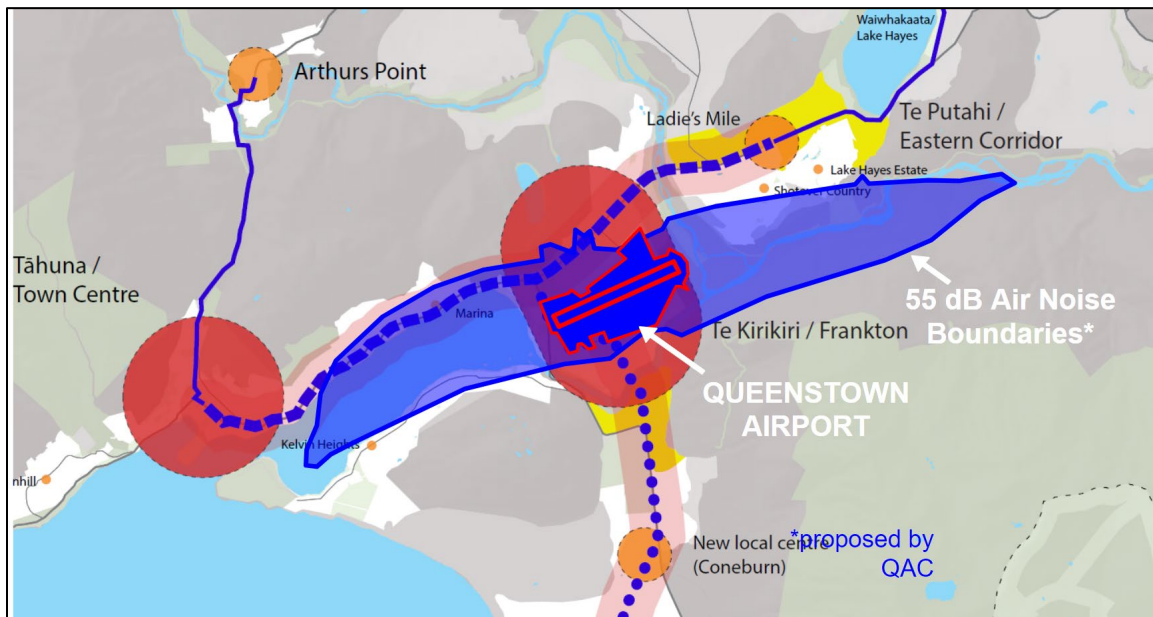
Any new idea such as relocating Queenstown Airport needs time to take hold. The first reason Mayor Boulton gave to retain the airport in Frankton in an interview with Crux (21/5/2019) was "the airport was put there for the very good and proper reason because it's close to the town." But when the airport was first gazetted in 1936 it was also a time when the steamboat Earnslaw carted sheep to the steam train Kingston Flyer, and the largely empty Frankton Flats was some distance from Queenstown and used only occasionally by small aircraft.

Our district, and indeed the world, is experiencing rapid change and such thinking has little merit when we are engaged in developing a 30-year, forward looking vision for our rapidly growing district.

### 1.2 Times have changed.

As the illustration below shows, we are no longer dealing with a small airport occasionally used near Queenstown, but with a large and rapidly expanding international jet airport situated in the dead centre of the district's major metropolis.

A busy international Jet Airport in the centre of town!



Map illustration of the Wakatipu connected centres as proposed in the draft Spatial Plan (page 52) with the property boundary of Queenstown Airport and the 55 dB air noise boundaries superimposed.

It is impossible to imagine that any urban planner would ever recommend the situation illustrated above if they were planning the district from scratch. If it were necessary and there was absolutely no other way to resolve the district's need for air connectivity, then maybe. But that is not the case.

### 1.3 We are not trapped – we have choices.

The MartinJenkins report confirmed that this district's need for air connectivity would most effectively be provided by a new regional airport. CIAL's \$45 million purchase of 750 ha near Tarras and its commitment to undertake all the costs and risks for the research, analysis, consultation, design, legal consenting, financing and construction of a new regional airport make it possible.

Our district's air connectivity is not dependent on having its major international airport located in the middle of Frankton. We have choices.

### 1.4 Obstructive political leadership

Current leadership in the district refuses even to acknowledge we have a choice. Far from seeking information or analysis that could inform our choices, our leadership is obstructing any information gathering, excluding it from the terms of reference of all analysis, planning or consultation, and publicly denouncing alternative options with often ill-informed statements such as a new airport would cost more than \$2 billion (it wouldn't), that it's morally reprehensible for CIAL to undermine the commercial value of QAC (it wouldn't, QAC's value could quadruple several times over as a Frankton property developer), that it would be legally impossible to achieve, and so forth.

### 1.5 Listen to the experts.

It is far more instructive to listen to the voices of those knowledgeable professionals who have skin in the game.



Senior executives at Christchurch International Airport Ltd, with commercial experience, industry-specific expertise and resource to properly assess the situation have determined it worth putting \$45 million up front to secure land near Tarras, a consolidated holding five times the size of Queenstown Airport. They estimate the total cost of the new airport to be \$800 million, with planning, consent and construction potentially achievable within 10 years.

Similarly, Air New Zealand has advised QAC, in its submission on the proposed expansion of air noise boundaries, that QAC would be unlikely to meet the airline's future service requirements even with its dual airport strategy and explicitly called for a new regional airport.

## 1.6 Major changes increase the likelihood of airport relocation.

Other major changes have occurred since Mr Boulton's interview with Crux where he described the notion to relocate Queenstown Airport as "the silliest thing I've heard."

### 1.6.1 QAC expansion plans rebuffed.

QAC has suffered massive public resistance to its dual airport expansion plans. Its public consultation for the expansion of its air noise boundaries in the Wakatipu saw the district's largest ever community response, with 92.5% of 1507 submissions being opposed. Its expansion plans for Wānaka Airport has seen 3 ½ thousand residents join in active opposition, with Wānaka Stakeholders Group engaging in legal action to challenge the process and plans.

### 1.6.2 MartinJenkins finds greater prosperity from new regional airport.

The MartinJenkins economic and social impact assessment identified that a new regional airport would enable greater economic prosperity than QAC's dual airport strategy. In that pre-Covid assessment, the analysis showed a new airport would be even better if operational within 10 years, rather than their 15-year presumption.

### 1.6.3 CIAL purchases 750 ha near Tarras.

Catching many by surprise, CIAL's land purchase has replaced the hypothetical with a real and credible alternative, one with the incentive and capacity to deliver. It has also expanded influence and control beyond local political leadership.

### 1.6.4 Covid 19 challenges business-as-usual tourism economy

Covid 19 has caused a seismic disruption of the district's economy, massively exposing its high dependence on international tourism.

This has led to significant community reflection and calls for change. The business-as-usual model dependent on high-volume tourism is being seriously questioned, openly challenging the presumptive need for visitors to be able to access their hotels within 15 minutes of landing, instead of taking one hour if the airport were near Tarras.

It's hard to achieve fundamental structural change when the economy is barrelling along as it has for the past 10 years in Queenstown Lakes District. The shock from Covid 19 gives a rare opportunity to reflect and rebuild. This increases the willingness for our community to consider fundamental structural changes such as the densification of Frankton and consequent relocation of Queenstown Airport.

### 1.6.5 Increased calls for economic diversification.

The major economic disruption caused by Covid 19 has also accelerated demands for economic diversification.

The immediate proximity of Queenstown Airport on Frankton Flats inhibits such diversification by both overcooking tourism and undermining the potential to develop the Frankton Flats as a world-class, walkable, smart city campus specifically designed to meet the needs and aspirations of knowledge-based enterprise – a place where, as Sir Paul Callaghan extolled, talent wants to live.

### 1.6.6 Climate change increasingly drives policy.

Public concerns regarding climate change are growing rapidly and increasingly drive public policy and commercial activity.

While climate activists have been quick to condemn the new airport proposal near Tarras, with 94% of Wānaka Stakeholders Group surveyed members citing climate change is their primary opposition to this new airport proposal, these objections could quickly change into support. A thorough emissions analysis that included the closure of Queenstown Airport (for all but VTOL) and the urban densification of Frankton would show a new Tarras airport could offer far more effective mitigation of climate change than QAC's dual airport proposal or having only Queenstown Airport operating scheduled air services.

Proper emissions analysis comparing QAC's dual airport proposal against CIAL's new airport near Tarras combined with the densification of Frankton as the district's major fully integrated metropolitan centre would soon have those concerned with climate change advocating for the redesign and densification of Frankton instead of retaining its airport.

This is explained more fully in Section 0.

### 1.6.7 QAC's lease of Wānaka Airport quashed

Just five days after this submission's deadline, the High Court quashed the contract between QLDC and QAC that had given QAC a 100-year lease of Wānaka Airport. The decision was based on shonky Council process (not using the Long-Term District Plan) and a poor consultation process (not fairly representing the nature of the decision).

This is a major setback for QAC's dual airport plans. It had required the lease's long-term certainty before it would invest \$300-\$400 million in the airport's development. With Wānaka communities' substantial and well organised opposition to jet aircraft it is difficult to imagine QAC could ever again obtain such a lease contract from Council.

QAC has been adamant that Queenstown Airport alone cannot meet future demand. With this major setback to QAC's development of Wānaka Airport, the door is now wide open for CIAL's proposed airport near Tarras to take the overflow.

With five times the land holding of Queenstown Airport – land purchased at prices a thousandfold cheaper than Frankton Flats – the proposed new airport could easily accommodate all the ancillary business and service operations and has already been described as a preferred option by Air New Zealand, the principal airline client.

Once a full-sized, modern airport near Tarras were operational it would become untenable to not use the Queenstown Airport land for desperately needed development of the Wakatipu's major metropolitan centre.

### 1.6.8 Replacement of RMA legislation.

The proposed abolishment of the RMA and its replacement likely next year with legislation specifically intended to facilitate wise, integrated urban and network development is another major enabling change that increases the likelihood for Queenstown Airport's closure in favour of a new regional airport near Tarras.

CIAL will find the legal process easier, as a thorough and integrated network analysis will unequivocally show its advantages ahead of QAC's dual airport plans.

### 1.6.9 National oversight of infrastructure networks

Less certain, but also possible, is that the air transport network be considered under some government oversight, such as national roads with the NZTA. Central government is reviewing the country's national infrastructure and how best to all plan for them.

The current debacle that proposes three competing international airports within 70 km, all driven by independent, competing local interests despite mostly public ownership, is obviously not the best way to develop the most effective national air transport network. Already there are many calls to central government to take some initiative to resolve these conflicts to achieve a more effective outcome.

Any such national oversight would almost certainly favour a single regional airport together with the closure of Queenstown Airport and densification of Frankton.

## 1.7 Possible, even likely.

What may have been a fanciful idea just two years ago is now a real possibility. It is increasingly untenable for those planning future investment in business or public infrastructure to flatly ignore these trends and uncertainty regarding the district's airports.