

## Summary of Evidence of Hannah Hoogeveen on behalf of Ladies Mile Property Syndicate Limited Partnership

(Primary Submission 77 and Further Submission 139)

### Key Evidence Points

1. The key points raised in my primary evidence related to three matters:
  - (a) the density minimum in the High Density Residential Precinct (**HDRP**);
  - (b) the residential visitor accommodation (**RVA**) provisions in the HDRP; and
  - (c) Changes to Rule 49.5.33 to align with amended policy provisions regarding required third-party transportation works.
2. With regard to this last matter, I agree with the changes made in the 8 December provisions and make no further comment.

#### *Minimum Density in the HDRP*

3. Regarding the density minimum of 60dph (gross) in the HDRP, I considered in my primary evidence that an appropriate amendment to the provisions would be to apply density on a net, rather than gross, site basis. As the provisions are linked with the MDRP this would have a flow-on effect on that precinct's minimum, which would possibly be too low having regard to the objectives for this Zone. I proposed that an alternative method would be to reduce the minimum in the HDRP from 60dph to 40dph.
4. I remain concerned that the density provisions as pursued by the Council (last updated 8 December) are not the most effective or efficient methods to achieve the efficient housing delivery objectives of the Zone. A key issue identified with developing this land is the effect on the transport network, particularly the effect on the capacity of Shotover Bridge and Ladies Mile.
5. Mr Parlane's evidence is that there is a minimum density the Precinct should definitely achieve, being 40dph, and that above this, there is a diminishing return on modal shift. This is agreed in the JWS for traffic. Therefore 40dph appears to be an appropriate density minimum based on the transportation evidence.
6. Ms Carleton highlights the real risk that land may not be developed in the medium and long term in this Precinct if the high minimum density threshold is retained. In my view, vacant land will not

achieve the housing delivery objectives for this Zone and that the required 40dph for transport modal shift may not occur if blocks of land are not developed.

7. Mr Wallace has set out examples of the typologies and densities of development at other similar masterplanned communities in New Zealand. These demonstrate that within the range of 40dph to 72 dph, the typology and diversity of housing choice the Variation is seeking can be achieved. In my view, by increasing the density range in the HDRP, proposed Objective 49.2.2 of the Variation is more effectively achieved.
8. A wider range of permitted densities provides more typology flexibility now, and in the future, without the need for complicated land covenanting processes. I have reviewed the updated HDRP density provisions by Mr Brown (last updated 8 December). I generally concur with those revisions subject to Rule 49.5.16.2(a) reading “...40-72...” for the reasons I have discussed.
9. These provisions also include a new non-complying rule for any development that is below 40dph, when using a new averaging rule of at least 55dph (gross). This is an alternative to using Rule 49.5.16.2(a). I consider that the averaging rule is not necessary, but I don't object to it. In my view the better approach is to simply rely on Rule 49.5.16.2(a) with an amendment to the minimum density to 40dph per the traffic, economic and urban design evidence of Mr Parlane, Ms Carleton, and Mr Wallace.

#### *Residential Visitor Accommodation*

10. Ms Carleton's evidence is that RVA assists with feasibility of the delivery of apartment typologies, particularly those above 2-3 level walk-up apartments. This is agreed in the JWS for economics. Non-complying activity rule 49.5.37 has been introduced through the rebuttal evidence to permit a portion of RVA in buildings four storeys or above. This rule is far more restrictive in terms of non-compliance status and permitted standards than the RVA rule in the rest of the District, where RVA is typically permitted up to 90 days and there is a consent pathway for a restricted discretionary activity beyond that.
11. Ms Carleton has explained the risk of precluding investor purchasers from the higher density market, being that investor demand creates the additional presales that enable supply and that without this, the typology will likely not be provided and the diversity in housing typology and choice will not be achieved, even in the long term. The non-complying activity status makes a resource consent application for RVA, where it might be needed to support feasibility and ultimately achieve the objectives of the zone by providing a greater number of dwellings and

greater mix of typologies, more difficult to achieve.

12. Overall it is my view that the provisions relating to RVA should be consistent with other residential zones in the District, and that the provisions in general need to be enabling of development in order to achieve the housing objectives of the zone.

H Hoogeveen

12 December 2023