

FORM 5

Submission on the Queenstown Lakes District Council Proposed District Plan 2017 (Stage 2)

Pursuant to Clause 6 of Schedule 1, Resource Management Act

To: Queenstown Lakes District Council

Submitter Details

Name: Safari Group of Companies Limited

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Submitter Details

Safari Group is a family owned business that develops and constructs hotels throughout New Zealand. To date Safari has completed and opened 10 hotels throughout New Zealand. Their first hotel in Queenstown is the Ramada Remarkables Park, which was completed in 2016. The Wyndham Gardens at Remarkables Park is currently under construction and due for completion in April 2018. Two further hotels are also proposed, one at Remarkables Park, and one on the corner of Frankton Road and Stanley Street.

Scope of Submission

This is a submission on Stage 2 of the Proposed Queenstown Lakes District Plan.

This submission is in regard to the proposed variation relating to visitor accommodation, and to the proposed Chapter 29- Transport Section.

In general, Safari Group Limited supports changes that recognise the importance of providing hotels within and around Queenstown, and that reduce car park and coach park requirements, in order to remove unnecessary restrictions on development where the development is appropriately located. Hotel developments are important for the future of Queenstown and their development should be supported and enabled by the District Plan.

The submitter could not gain an advantage in trade competition through this submission.

1. Visitor Accommodation Variation

1.1 General

Safari Group Limited is opposed to proposed changes that make it more difficult to provide hotel developments where they are appropriately located. The High Density Residential zone is an appropriate location for visitor accommodation activities, particularly where located in close proximity to the town centre, arterial roads or close to service centres.

While the Operative District Plan provides for visitor accommodation in the HDR as a controlled activity, that status is proposed to change to Restricted Discretionary in the proposed variation. This change in activity status is not justified and is not necessary. The Council should be supporting the development of hotels where appropriately located.

Further, the Operative District Plan currently provides for visitor accommodation activities as a Restricted Discretionary Activity in the Low Density Residential Zone. The variation proposes that, pursuant to proposed rule 7.4.18, the activity status changes to non-complying. Such a change is not justified and is opposed. There are appropriate locations within the Low Density Residential Zone that can accommodate visitor accommodation.

Relief sought

That Rule 9.4.9 that lists visitor accommodation in the HDR as a Restricted Discretionary Activity, is deleted and replaced with a rule that lists visitor accommodation as a Controlled activity.

That Rules 7.4.18 and 8.4.31 are deleted and replaced with a rule that provides for visitor accommodation activities in the Low Density and Medium Density Residential Zones as a restricted discretionary activity.

2. Transport Section 29

2.1 General:

Safari Group submits that the proposed Transport rules should reflect the importance of enabling appropriately located hotel developments. In general, Safari Group supports provisions that discourage the use of private vehicles, and that enable hotel development in appropriate locations (i.e. close to public transport linkages, and close to town centre and mixed use zones).

Safari Group submits that the proposed rules are overly restrictive and onerous and require a significant and unnecessary number of car and coach parks for hotel developments. Such requirements are inflexible and will potentially make hotel developments unfeasible. They appear to be based on assumed travel behaviour, instead of taking a strategic approach and recognising that travel behaviour will, and should, change into the future. It is unclear as to why the Council has chosen to retain car park requirements that are based on outdated demand assumptions.

The provisions as notified are onerous and have the potential to make future hotel developments unfeasible, and for these reasons, are opposed.

Relief sought:

That Section 29: Transport provisions are amended to encourage changes in travel behaviour, recognising that there will be less demand for on site car and coach parking into the future.

Requirements for car and coach parks should be relaxed, recognising the importance of enabling hotel developments where they are appropriately located. Car and coach park demand should not be based on arbitrary and outdated demand assumptions.

2.2 Policies

Policy 29.2.2.5 is supported in that it enables a reduction in the number of on site car parks required. However, it is worded strongly, and should be amended to provide greater clarity, and greater level of support for appropriate applications that demonstrate that the effects of a reduction in the number of on site car parks are less than minor.

Policy 29.2.4.5 encourages compact urban growth by reducing car park requirements in the most accessible locations. This policy is clearly linked to Policy 29.2.2.5 and they should be consistently supportive of provision of fewer cars parks.

Relief Sought:

That the Objectives and Policies are amended to encourage reduced private vehicle use, and to better support a reduction in on site car and coach park requirements for hotel developments.

That the objectives and policies provide a clearer framework and level of guidance for assessing resource consent applications.

2.3 Rules- General

In general, while the objectives and policies encourage a reduction in private vehicles, future changes in travel behaviour are not reflected in the proposed rules.

It is submitted that the proposed rules in Sections 29.4 and 29.5 are onerous and make hotel developments, even where close to the town centre or on public transport routes, unfeasible.

Relief Sought:

That the rules proposed in Sections 29.4 and 29.5 are amended to reflect the future changes in travel behaviour, and the importance of enabling hotel developments where appropriately located.

2.4 Rules – Specific Comments

Proposed Rule 29.4.10 requires Restricted Discretionary Activity consent for any 'high traffic generating activity'. This includes any hotel with more than 100 rooms.

This rule is imposed in addition to visitor accommodation rules within which control is reserved over traffic effects, and in addition to the car park requirements, which require a significant number of car parks based on assumed traffic demand.

It is submitted that car park requirements for hotel developments should be assessed only under the rules for visitor accommodation, rather than triggering separate and repetitive rules.

Car park requirements should not be based on an assumed traffic demand.

Relief sought:

That Rule 29.4.10, which requires Restricted Discretionary Activity for any High Traffic Generating Activity, is deleted.

That car park requirements for hotels is deleted. These are based on assumed traffic demand, which will change into the future as travel behaviour changes.

That traffic effects are assessed as part of the land use consent for hotel developments.

2.5 Rule 29.5.1 Accessory parking

It is unclear as to what 'accessory parking' means. The matters over which discretion is reserved is limited. It is unclear as to how an application that proposes fewer than the required car parks would be assessed.

Relief sought:

Clarify what is meant by 'accessory parking'. Amend the Rule to make it clearer as to what effects are to be managed. Clarify that there are situations where a reduced number of car parks is both appropriate and positive and should therefore be supported.

2.6 Rule 29.5.2 Location and availability of parking spaces.

The clauses that enable off-site car parks are supported. However, they remain overly onerous, given that they require off site parks to be no greater than 800m from the site. This is an arbitrary distance and would be difficult to achieve in reality.

It is unclear as to why off site car parking or coach parking can not be located on a street or private road. If approval has been obtained from the landowner, and the proposed car parking is safe and effective then this may be a practicable and appropriate solution that should be enabled.

Relief sought:

That the ability to provide coach and car parking off site is retained.

That the requirement to provide off site car and coach parking within 800m of the site is deleted.

That clause (iii) is deleted.

2.7 Rules 29.3 Standards for activities outside roads

These rules are onerous and should be revisited to ensure that they do not make development unfeasible. For instance, Rule 29.5.7 which restricts any heavy vehicles from reverse manoeuvring onto the street, should be deleted as it will make many developments unfeasible.

Relief Sought

That the Standards listed at 29.3 are revisited and amended to ensure that they do not unnecessarily limit developments by imposing standards that are too restrictive.

2.8 Rule 29.9 Minimum car parking requirements

The car park requirements listed in Table 29.9 do not reflect a need to encourage a change in travel behaviour, but instead require significant car parking for all developments based on an assumed travel demand.

The car park requirements are largely unchanged from the Operative District Plan. They have not been amended to recognise future changes in travel behaviour, or how developments can help in changing travel behaviour.

The proposed car park requirements should be amended by significantly reducing car park requirements for hotel developments. Hotel developments that are located on public transport routes, and that are in close proximity to the town centre, service centres or mixed use zones, should not have to provide a set number of on-site car and coach parks.

Relief sought:

That the car park requirements for hotel developments are deleted. Alternatively, that they are amended so that hotel developments that are appropriately located are not required to provide a specific number of on site car or coach parks.

Provision for car parking should be dealt with pursuant to the land use consent for the hotel, rather than being assessed against an arbitrary figure for car park demand.

3. Conclusion

Safari Group **DOES** wish to be heard in support of its submission.

Signed on behalf of the submitter



Jenny Carter

Date: 23.2.2018