

20th September 2019

Queenstown Lakes District Council
Private Bag 50072
Queenstown 9348

Attention: Craig Barr

Dear Craig,

Queenstown Lakes District Plan Review – Rural Visitor Zone - Cardrona

Thank you for the opportunity to provide input on the draft options for the review of the Rural Visitor Zone at Cardrona.

Introduction

We act for Brooklynne Holdings Limited (BHL) who own or have an interest in a substantial land holding within the Rural Visitor Zone at Cardrona as follows:

- Lot 4 DP 507227;
- Lots 7, 8, 9, 10, 11, 12 13, 14, 15, 16 and 17 DP 440230;
- Lot 1 DP 310692; and
- Section 47 BLK 1 Cardrona SD.

These land holdings are shown on **Figure 1** below.

BHL also has ownership in the Cardrona Community Water Supply Scheme through a subsidiary company being Cardrona Water Supply Limited.

It should also be noted that BHL have also entered into an agreement with Crown to rectify land title oddities that have arisen as the Cardrona River has changed course over time. As a result of these changes the esplanade reserve previously created along the Cardrona River is no longer aligned with the banks of the river. BHL has agreed with the Crown to exchange land that is located adjacent to the Cardrona River to ensure that the esplanade reserve is realigned to the new course of the river. This land exchange process has not yet been completed.

A copy of the scheme plan prepared to confirm the agreement for the exchange of the land is shown in **Figure 2** below. Once the land exchange is completed some 9,243m² of Crown land (identified as Sections 1 – 8 and Sections 10 - 12 on the scheme plan) located along the western side of the Cardrona River will be transferred to BHL, and some 11,528m² of land owned by BHL (identified as Sections 22, 23, 24 and 26 on the

scheme plan) located along the eastern side of the Cardrona River will be transferred to the Crown. This land exchange process will result in a net loss of land for BHL.

This land will become available for development at this time and should be zoned accordingly through the District Plan Review process.

Figure 1



BHL has also recently lodged a resource consent application (RM190669) for the comprehensive development of the land located on the western side of the Cardrona River for visitor accommodation and residential activities. The proposed development will comprise a mix of hotels, serviced apartments, residential apartments, serviced terraced units, residential terraced units, residential dwellings, hostels and other

centralised services and facilities accessory to the visitor accommodation activities, including food and beverage spaces, gym space and shared function spaces. An overview of the proposed development is shown on **Figure 3** below.

Figure 2



Figure 3



There is also an approved resource consent (RM061204) relating to the land on the eastern side of the Cardrona River (Section 47 BLK I Cardrona SD) to undertake earthworks, construct a lodge for visitor accommodation purposes, construct 48 units for visitor accommodation and residential use, construct a managers residence and establish landscaping, car parking and access to service the proposed activities. This resource consent expires on 6th May 2020. As such, the environment at this site needs to be considered in the context of the consented development, and any assessment of landscape sensitivity does need to take this into account.

General Comments

BHL preference is to retain the Rural Visitor Zone as per the Operative District Plan (Option 1). However, as the Council is of the view that the operative provisions may not be the most appropriate for Cardrona, this is an unlikely outcome. BHL next preference is that all their land (as detailed above) including the land to be provided to BHL through the land exchange with the Crown is rezoned to settlement zone with a commercial precinct or overlay or a visitor accommodation precinct or overlay (Option 4). The precinct or overlay areas should be positioned to reflect the activities that are being proposed as part of the comprehensive development of the BHL land holdings under resource consent application RM190669.

As indicated above, the land that is to be made available for future development on the western side of the Cardrona River once the agreed land swap with the Crown has

been completed should also be rezoned to settlement zone with a commercial precinct or overlay or a visitor accommodation precinct or overlay.

Figure 4



In this respect:

1. A 20 metre to 30 metre wide commercial precinct or overlay should be provided along the land on the eastern side of Cardrona Valley Road that is

contained within the current Rural Visitor Zone and along the land on the northern and southern sides of Soho Street that is contained within the current Rural Visitor Zone (a sketch up of the suggested commercial precinct or overlay area is shown on **Figure 4** above) that provides for commercial activities and visitor accommodation activities as Permitted Activities.

2. A visitor accommodation precinct or overlay should be provided over the remaining BHL land holdings that provides for visitor accommodation activities and residential activities as Permitted Activities.

The comprehensive development of the BHL land holdings proposed under resource consent application RM190669 provides for centralised services and facilities accessory to the proposed hotel activities at the Soho Street / Rivergold Way hub of the proposed development. These activities will comprise of cafes, restaurants and shared function spaces. It is therefore logical to extend a commercial precinct or overlay along both sides of Soho Street from Cardrona Valley Road to cover these likely future activities. A commercial precinct or overlay will also provide for recognition of the visitor hub or heart of Cardrona that is to be created around the intersection of Soho Street and Rivergold Way in the future.

The proposed development also provides for centralised services and facilities accessory to the visitor accommodation (backpackers) activity that is proposed at the corner of Cardrona Valley Road and Rivergold Way. These services will comprise of a café and bar. It is therefore logical to also provide a commercial precinct or overlay along the eastern side of Cardrona Valley Road.

Specific Comments

The more specific comments in relation to the proposed Settlement Zone with precincts or overlays at Cardrona are detailed below.

1. The activities the zone and / or the precinct or overlay is intending to accommodate should be provided for as Permitted Activities to ensure that certainty is provided as to the activities that are desired within the zone and / or the precinct or overlay. The control of amenity outcomes should be achieved through the provision of Controlled or Restricted Discretionary Activity status for buildings with specific design related matters for control or discretion and design focused assessment criteria. In this respect visitor accommodation and residential activities should be Permitted Activities in the Visitor Accommodation Precinct or Overlay and visitor accommodation, residential and commercial activities should be Permitted Activities in the Commercial Precinct or Overlay. Overall, the activity component of proposals should be permitted while the built component of proposals should be controlled or restricted discretionary.

2. Commercial activities should be restricted to ground floor areas only except for commercial activities that are provided in conjunction with visitor accommodation activities. This will encourage an outcome that provides for buildings with commercial activities at the ground floor fronting to the street with visitor accommodation or residential activities at the upper levels of the buildings.
3. The current 8 metre height limit for residential activities and 12 metre height limit for visitor accommodation activities should be retained.
4. An 80% building coverage limit is supported. It is considered that the Cardrona Village should support a higher density of residential and visitor accommodation activities to ensure the limited land resource available within the village is used efficiently to support the major recreation and tourist attractions that are located within the wider Cardrona Valley area. This will ensure that the growth of the village is retained within its current zoned limits (Rural Visitor Zone) thereby continuing to protect the surrounding outstanding natural features and landscapes from inappropriate subdivision, use and development. This intention should be made clear in the objectives and policies for the Settlement Zone.
5. The provision of dwellings as a permitted activity within the Settlement Zone and the associated Visitor Accommodation or Commercial Precincts or Overlays subject to design standards is supported.
6. Set back from boundaries and recession planes should only be required at zone boundaries, precinct or overlay boundaries or water body boundaries.
7. The intended use of the Cardona Village Character Guidelines as the mechanism to manage the delivery of development that is consistent with the characteristics that makes Cardrona distinctive is supported in principle. However, it is considered that these Guidelines are now somewhat outdated (having been prepared over 10 years ago). The Guidelines should therefore also be reviewed as part of the District Plan Review process if they are intended to be included as a statutory instrument within the District Plan.
8. There should not be a standard that specifies a minimum pitch for gable roofs. A general encouragement of gable roof forms is considered appropriate. However, a specific pitch requirement will unreasonably restrict innovative development that may still be able to achieve the amenity outcomes desired by the gable design direction for primary roof forms on buildings. The statutory focus on gable roof forms also creates a situation where other alternative innovative approaches are immediately deemed to result in an adverse effect (because they are not entirely consistent with the direction)

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where this may not necessarily be the case where high quality design approaches are still undertaken. The Settlement Zone provisions should provide the opportunity for other design outcomes to be considered without any possible pre-determination as to adverse amenity effects where an alternative option may be acceptable in the context of the developing settlement of Cardrona (e.g. commercial buildings in the commercial precinct or overlay areas).

9. Resource consent applications for buildings for visitor accommodation, residential or commercial activities located within the Visitor Accommodation or Commercial Precincts or Overlays should not be required to obtain the written approval of other persons where the standards can be met and should not be required to be notified or limited notified.
10. To ensure that design lead development outcomes are achieved there should only be minimum lot sizes for vacant site subdivisions. Subdivision within the Visitor Accommodation or Commercial Precincts or Overlays in accordance with an approved land use resource consent and / or around existing buildings and development should not be subject to any minimum lot size or shape factor standards and should be provided for as a Controlled Activity.

We trust these comments are useful for the finalisation of the proposed changes to the operative Rural Visitor Zone at Cardrona.

Please do not hesitate to contact the writer if you have any queries or concerns.

Yours faithfully,



Tim Grace

Technical Director - Planning

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