#### SUBMISSIONS ON QLDC PROPOSED DISTRICT PLAN BY WILLOWRIDGE DEVELOPMENTS LIMITED

Provision	Support/Oppose	Submission	Relief Sought
Entire Proposed Plan			
All Provisions	Oppose	Willowridge opposes the Proposed District Plan as it fails to review all chapters of the District Plan. This disjointed approach is an inefficient process and will lead to poor planning outcomes. The proposed District Plan sets the urban growth boundaries for Queenstown, Wanaka and Arrowtown. It is important that the land within the urban growth boundaries is appropriately zoned to provide for the residential and economic growth of the urban areas within the life of the Plan. In order to achieve the correct zoning all zoning options should be available for consideration. It is impossible to correctly zone land within the urban growth boundaries without the business and industrial zones being included as part of the review. Exclusion of the Township Zones is also problematic and could result in growth and development within the Districts townships being unduly stifled or inappropriate zoning applied to enable growth within townships in advance of the township zone being reviewed. There are no apparent advantages to the piecemeal approach taken in reviewing the District Plan in two stages.	Willowridge submits that the entire District Plan review should be put on hold or rejected until such a time as the remaining chapters are included in the review.
Objective 3.2.1.1 and	Oppose	Objective 3.2.1.1 and related policies refer to the Queenstown and	Objective 3.2.1.1
policies 3.2.1.1.1 to 3.2.1.1.3 Objective 3.2.1.2		<ul> <li>Wanaka central business areas. These central business areas are not identified on the maps and there is no definition of 'central business area'. It is therefore unclear what areas they relate to.</li> <li>There are a number of key business areas in Queenstown and Wanaka: <ul> <li>The existing town centres;</li> <li>Three Parks and Anderson Heights in Wanaka;</li> <li>Remarkables Park and Five Mile in Queenstown.</li> </ul> </li> <li>These areas are all hubs of the resort's and Districts economy where economic activity and growth should be focused.</li> </ul>	Recognise, develop and sustain the Queenstown and Wanaka <del>central</del> business <u>and commercial</u> areas as the hubs of New Zealand's premier alpine resorts and the District's economy. Policies 3.2.1.1.1 Provide a planning framework for the Queenstown and Wanaka <del>central</del> business <u>and</u>

		Objective 3.2.1.2 seeks to recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka central business areas. If the Queenstown and Wanaka central business areas exclude areas such as Three Parks then objective 3.2.1.2 will undermine the function of Three Parks as a key economic centre servicing the wider District. The objectives and policies should be reworded to ensure all key economic areas are included.	<u>commercial</u> areas that enables quality development and enhancement of the centres as the key commercial hubs of the District, building on their existing functions and strengths. 3.2.1.1.2 Avoid commercial rezoning that could fundamentally undermine the role of the Queenstown and Wanaka <del>central</del> business <u>and</u> <u>commercial</u> areas as the primary focus for the District's economic activity. 3.2.1.1.3 Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka <del>central</del> business <u>and</u> <u>commercial</u> areas. Objective 3.2.1.2 Recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside
			functions served by commercial
Policy 3.2.2.1.6	Oppose	Policy 3.2.2.1.6 seeks to ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships to reduce the incentive for land banking in order to address housing supply and affordability. This policy is a flawed for a number of reasons:	Delete policy 3.2.2.1.6

		<ul> <li>It will result in a poor planning outcome. Land should be rezoned based on its suitability for development and not based on the land ownership.</li> <li>Landowners are not necessarily land developers and may end up not developing the land, which will have the same effects as land banking.</li> <li>Landowners who do not have the expertise or financial ability to develop their land may sell to established development companies (such as those the policy is presumably trying to avoid)</li> </ul>	
Urban Development			
4.2.6 Wanaka Urban Growth Boundary	Oppose	<ul> <li>Section 4.2.6 includes a map showing the proposed Wanaka Urban</li> <li>Growth Boundary. This boundary should be extended to include Lot</li> <li>3 DP17123 as shown on Attachment 1.</li> <li>This parcel of land is adjacent to both the Three Parks Special Zone</li> <li>and the Ballantyne Road Mixed Use Zone and is opposite Ballantyne</li> <li>Road Industrial Zone. Lot 3 can make a valuable contribution in terms</li> <li>of the provision of additional industrial land in an area where such</li> <li>activity is already focused.</li> <li>The land zoned within Three Parks is for business activity and the</li> <li>supply of land zoned, or proposed to be zoned industrial B on the</li> <li>opposite side of Ballantyne Road is limited.</li> <li>It is important that the District Plan zones sufficient employment land</li> <li>to encourage and enable new business and industrial activity in</li> <li>Wanaka for the lifetime of the plan. Including this area of land will</li> <li>assist in ensuring sufficient land is available for urban growth.</li> </ul>	Include Lot 3 DP17123 within the Urban Growth Boundary for Wanaka.
Landscape			
6.3.1.3	Oppose	Policy 6.3.1.3 requires that subdivision and development proposals within and Outstanding Natural Landscape or Outstanding Natural Feature be assessed against the assessment matters in provisions 21.7.1 and 21.7.3. The policy goes on to state that subdivision and development is inappropriate in almost all ONL or ONF locations,	Policy 6.3.1.3 That subdivision and development proposals located within the Outstanding Natural Landscape or an Outstanding Natural Feature be

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		meaning successful applications will be exceptional cases.	assessed against assessment matters
		The proposed ONL and ONF boundaries cover broad areas within the	in provisions 21.7.1 and 21.7.3
		District. Within these broad areas there will be some areas that are	because subdivision and
		suitable for subdivision and development. The wording of the policy	development is inappropriate in
		is a very strong presumption against any subdivision or development	almost all locations, meaning
		and pre-empts the outcome of an assessment against the assessment	successful applications will be
		matters.	exceptional cases.
		The detailed assessment matters referred to by the policy will enable	
		a thorough assessment of whether development is acceptable. The	
		policy should not pre-empt the outcome of this.	
Low Density Resi	dential		
7.5.5	Oppose	Rule 7.5.5 of the Low Density Residential Zone provides for building	Provide for 50% building coverage
		coverage of 40%. The minimum lot size for the Low Density	for lots between 450m <sup>2</sup> – 700m <sup>2</sup> .
		Residential Zone is 450m <sup>2</sup> . At 40% coverage a 450m <sup>2</sup> lot could	
		accommodate a building of 180m <sup>2</sup> ground floor area including garage,	
		which is likely to be too small for many people. The building coverage	
		should be increased where smaller lots are provided for.	
Local Shopping C	entre Zone	· · · · · ·	•
15.4	Oppose	The rules in the Local Shopping Centre Zone are permissive of	Include rules in 15.4 to restrict retail
		commercial and retail activities and seem to provide for a range of	activities to those providing a local
		activities from small scale shopping to supermarkets. This has the	service (dairies, off-license, bakery)
		potential to undermine the town centres and other commercial	with a gross floor area of no more
		centres, particularly where the land zoned neighbourhood shopping	than 400m <sup>2</sup> , or rules to a like effect.
		centre of a significant size, such as the neighbourhood shopping	
		centre on Cardrona Valley Road.	
Rural Zone	·	·	•
21.7.1.1	Oppose	Section 21.71 sets out the assessment matters (landscape) for	Delete assessment matter 21.7.1.1.
		Outstanding Natural Features (ONF) and Outstanding Natural	
		Landscapes (ONL). The matters listed in 21.7.1.3 to 21.7.1.6 are	
		sufficient to enable a thorough assessment of the appropriateness of	
		a subdivision or development. Assessment matter 21.7.1.1. which	
		states that 'the assessment matters are to be stringently applied to	
		the effect that successful applications will be exceptional cases' is	

		unnecessary and could predetermine the outcome of applications in ONF's and ONL's.	
21.7.1.2	Oppose	<ul> <li>Assessment matter 21.7.1.2 relates to vegetation that was planted or self-seeded and less than 1m in height at 28 September 2002 and obstructs or substantially interferes with views of the proposed development from roads or other public places and states that such development shall not be considered beneficial under any of the assessment matters and as part of the permitted baseline.</li> <li>This assessment matter is inconsistent with the provision that planting is a permitted activity and therefore part of the permitted baseline.</li> <li>Furthermore, screen planting is often used as a mitigating factor for new development. The issue of whether the screen planting exists or is proposed should be irrelevant as existing screen planting can be protected by way of a condition of consent and can therefore be relied upon as mitigation.</li> <li>Assessment matter 21.7.1.2 does not meet the purpose of the Act in terms of mitigating effects on the environment.</li> </ul>	Delete assessment matter 21.7.1.2
Subdivision and De 27.4	Oppose	Rule 27.4.1 provides for all subdivision as a Discretionary Activity, unless otherwise stated. Where a subdivision activity complies with all the relevant standards for the Zone within which it lies, it is unreasonable for Council to retail discretion over the determination of the application. This is particularly relevant for urban zones, such as the Residential Zones where residential subdivision is an anticipated activity.	Add new rule providing for subdivision in the residential zones as a controlled activity.
27.5.1	Oppose	The table contained at 27.5.1 sets out minimum lots sizes for each zone. The minimum lot size for the low density residential zone is 450m <sup>2</sup> . This is significantly smaller than the current minimum lot size for Wanaka of 700m <sup>2</sup> . Willowridge is concerned that this reduction in minimum lot size could have an adverse effect on the character of the town.	Increase the minimum lot size for low density residential development in table 27.5.1 to 700m <sup>2</sup> .
Maps			

Map 23	Oppose	Map 23 identifies an area of land to the north of Studholme Road and	The Large Lot Residential boundary
		around West Meadows Drive as Large Lot Residential.	at Studholme Road/West Meadows
		This area of zoning does not take into consideration the existing	Drive should be amended as per
		urban environment or existing land boundaries.	Attachment 2.
		The West Meadows Drive area is a low density residential	The Neighbourhood Shopping Centre
		environment. Much of the area is already developed and titles have	on Cardrona Valley Road is reduced
		recently been issued for the West Meadows Stage 5 to the south of	in size as per Attachment 2 and any
		West Meadows Drive and north of Maggies Way. The uptake of low	consequential changes to other
		density residential land at this location is high.	Maps.
		The remaining large lots immediately to the south of West Meadows	
		Drive are serviced from West Meadows Drive and considered as part	
		of the West Meadows subdivision. Developing these large lots to low	
		density residential density would be a more sustainable use of land at	
		this location; would be consistent with the character of the West	
		Meadows subdivision; and would meet the existing demand for low	
		density residential allotments at this location. The Large Lot	
		Residential Zone boundary should be amended to exclude the West	
		Meadows land.	
		It is also noted that there are some existing low density residential	
		lots to the north of West Meadows Drive that are partially zoned	
		Large Lot Residential. This is inappropriate given the existing lot size	
		and is also confusing to property owners. The line should be amended to address this.	
		Map 23 also contains the Cardrona Valley Road Local Shopping Centre	
		Zone. The area of this zone is significantly greater than that identified	
		in the Wanaka Structure Plan. Willowridge submits that the size of	
		this zone is beyond what could be considered a 'local shopping	
		centre' at this location and it could have the potential to undermine	
		the Wanaka town centre and the Three Parks Commercial Core.	
Map 18 and Map 23	Oppose	Lot 3 DP17123 is shown on Maps 18 and 23 as Rural Zone. This parcel	Rezone Lot 3 DP17123 as Industrial B
		of land is adjacent to both the Three Parks Special Zone and the	Zone and include within the Wanaka
		Ballantyne Road Mixed Use Zone and is opposite Ballantyne Road	Urban Growth Boundary as shown

		Industrial Zone. Lot 3 can make a valuable contribution in terms of the provision of additional industrial land in an area where such activity is already focused. Lot 3 should be included within the Wanaka Urban Growth Boundary. The land zoned within Three Parks is for business activity and the supply of land zoned, or proposed to be zoned industrial B on the opposite side of Ballantyne Road is limited. It is important that the District Plan zones sufficient employment land to encourage and enable new business and industrial activity in Wanaka for the lifetime of the plan. Including this area of land will assist in ensuring sufficient land is zoned.	on <b>Attachments 3a and 3b</b> and any consequential changes to other Maps.
Map 11	Oppose	Map 11 contains Luggate and surrounding areas. The land zoned Rural Residential and Rural to the north and east of the Luggate Township is the Luggate Village development land. Stages 1A, 1B and K of the development are complete.The next stages of the development, Stage 2A and 2B have been consented through RM060392 and RM060393 (and subsequent extensions of lapse periods). Provision has been made for these stages within the existing infrastructure.Willowridge Developments Limited acquired the Luggate Village land in 2015 and intends to commence development of the next stage as part of its 2016 programme of works. The 2A subdivision proposes Low Density Residential density development and the 2B subdivision proposes Rural Residential Zone density. The proposed District Plan Maps should reflect this use of the land in order to make the zoning consistent with the intended land use.	Rezone land to the east of Luggate Township as Low Density Residential and Rural Residential as per <b>Attachment 4</b> and any consequential changes to other Maps.
Map 17	Oppose	Map 17 relates to Hawea. Much of Hawea is zoned Township with a minimum lot size of 800m <sup>2</sup> . Some of the land to the south of Hawea is zoned Rural Residential, which has a minimum lot size of 4,000m <sup>2</sup> . Willowridge owns land between Domain Road, Noema Terrance, Capell Avenue and Cemetery Road knows as Timsfield. Part of this land is zoned as Township and part is arbitrarily zoned as Rural	Rezone land at Hawea Low Density Residential as per <b>Attachment 5</b> and any consequential changes to other Maps.

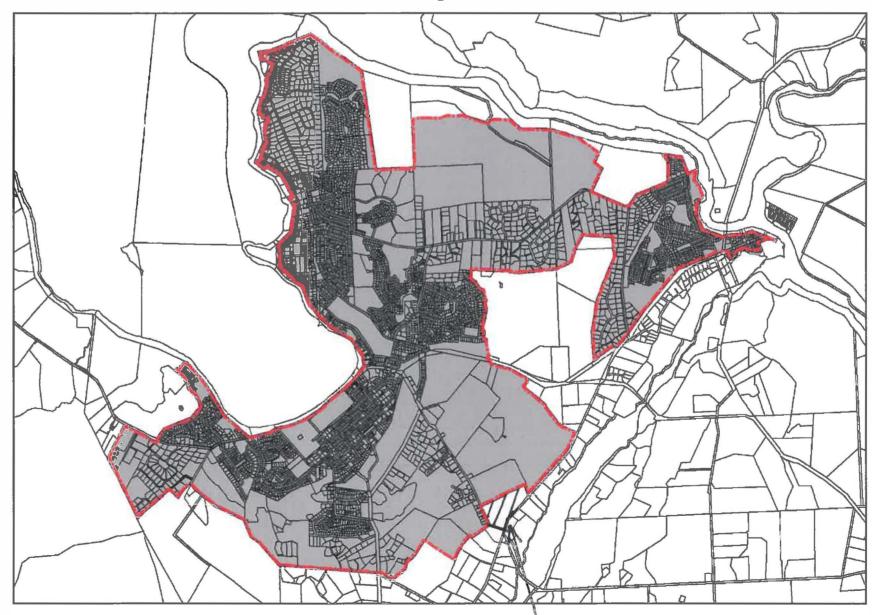
	Residential. Willowridge has developed Timsfield as a more affordable alternative to living in Wanaka. The sections are consistently popular and Willowridge aims to continue to provide these affordable sections. The zoning of this land is unchanged from that of the operative District Plan. Willowridge is disappointed to see the arbitrary area of Rural Residential land remain over what is a valuable land resource for meeting affordable housing needs. The township zone provides for 800m <sup>2</sup> sections. Willowridge considers this to be too large and an inefficient use of the land. Willowridge submits that the land shown on <b>Attachment 5</b> should be rezoned as Low Density Residential in order to ensure an on-going supply of affordable residential sections and to ensure the most efficient use of the land resource.	
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## WILLOWRIDGE ATTACHMENT 1

- opportunity for sensitively designed medium density infill development in a contained area closer to the town centre, so as to provide more housing diversity and choice and to help reduce future pressure for urban development adjacent or close to Arrowtown's Urban Growth Boundary.
- a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowtown
- for Feehley's Hill and land along the margins of Bush Creek and the Arrow River to be retained as reserve areas as part of Arrowtown's recreation and amenity resource.
- To recognise the importance of the open space pattern that is created by the inter-connections between the golf courses and other Rural General land

#### Wanaka

#### 4.2.6 **Objective - Manage the scale and location of urban growth in the** Wanaka Urban Growth Boundary.

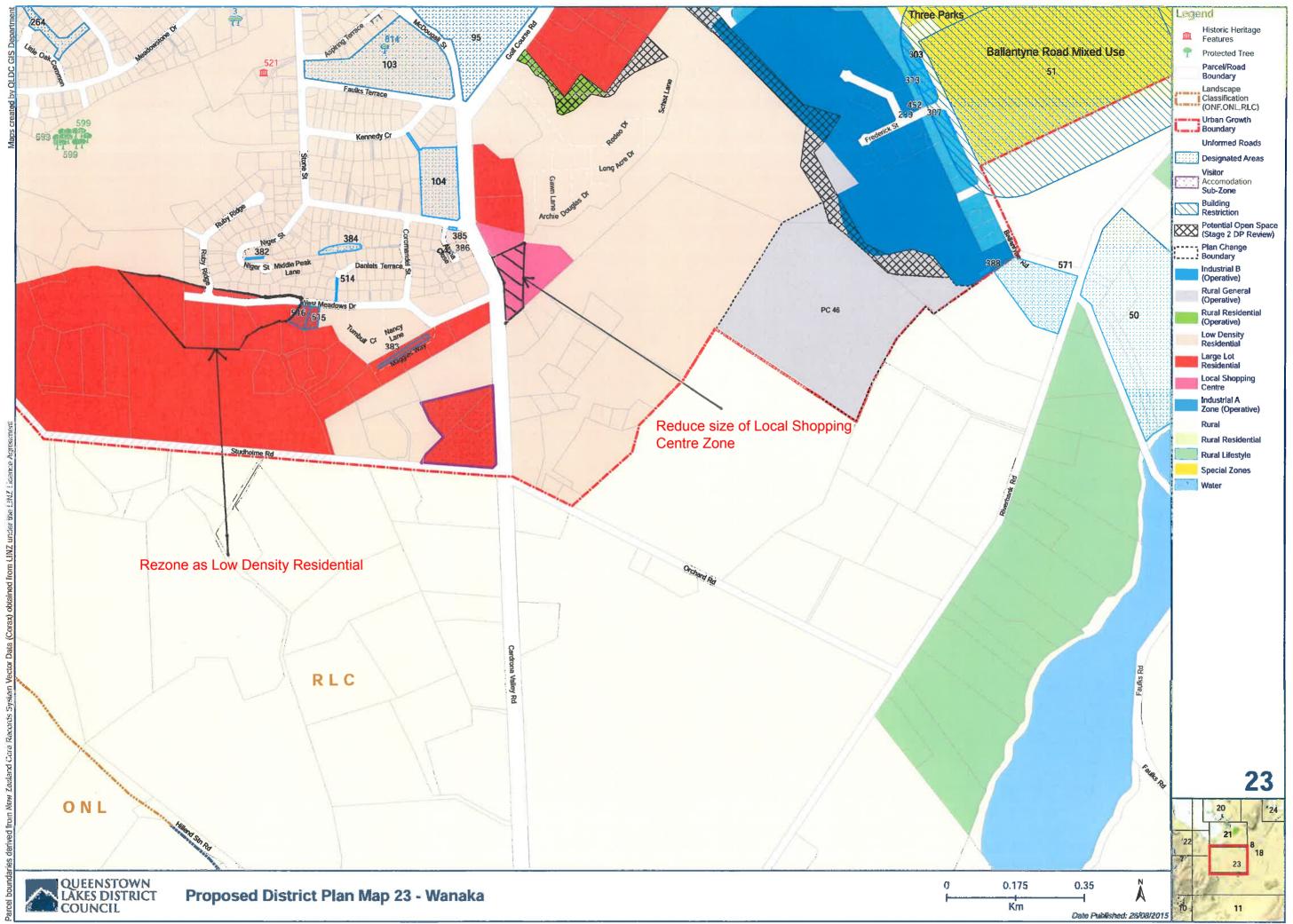


Include Lot 3 DP17123 in Wanaka Urban **Growth Boundary** 

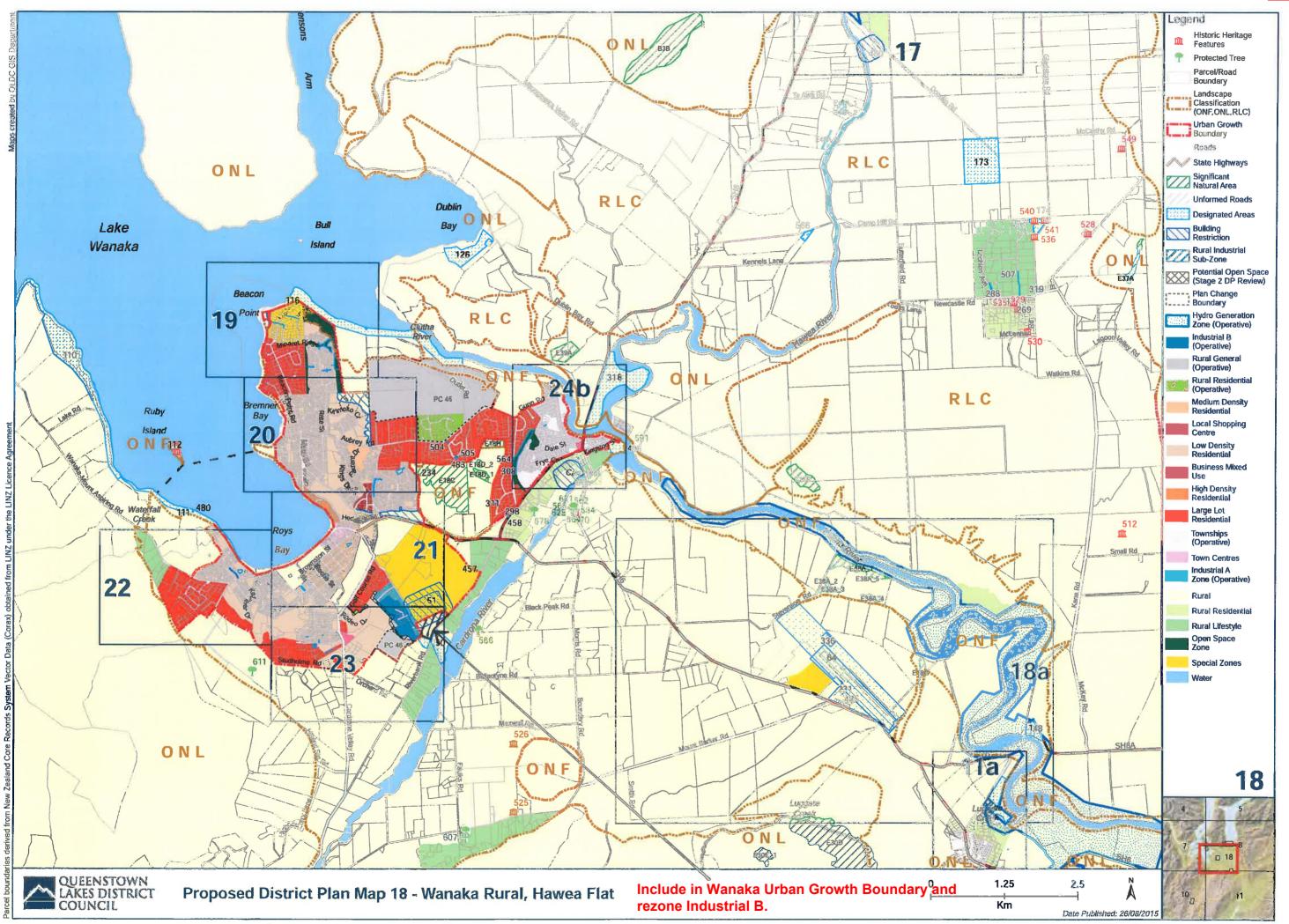


### WILLOWRIDGE ATTACHMENT 2

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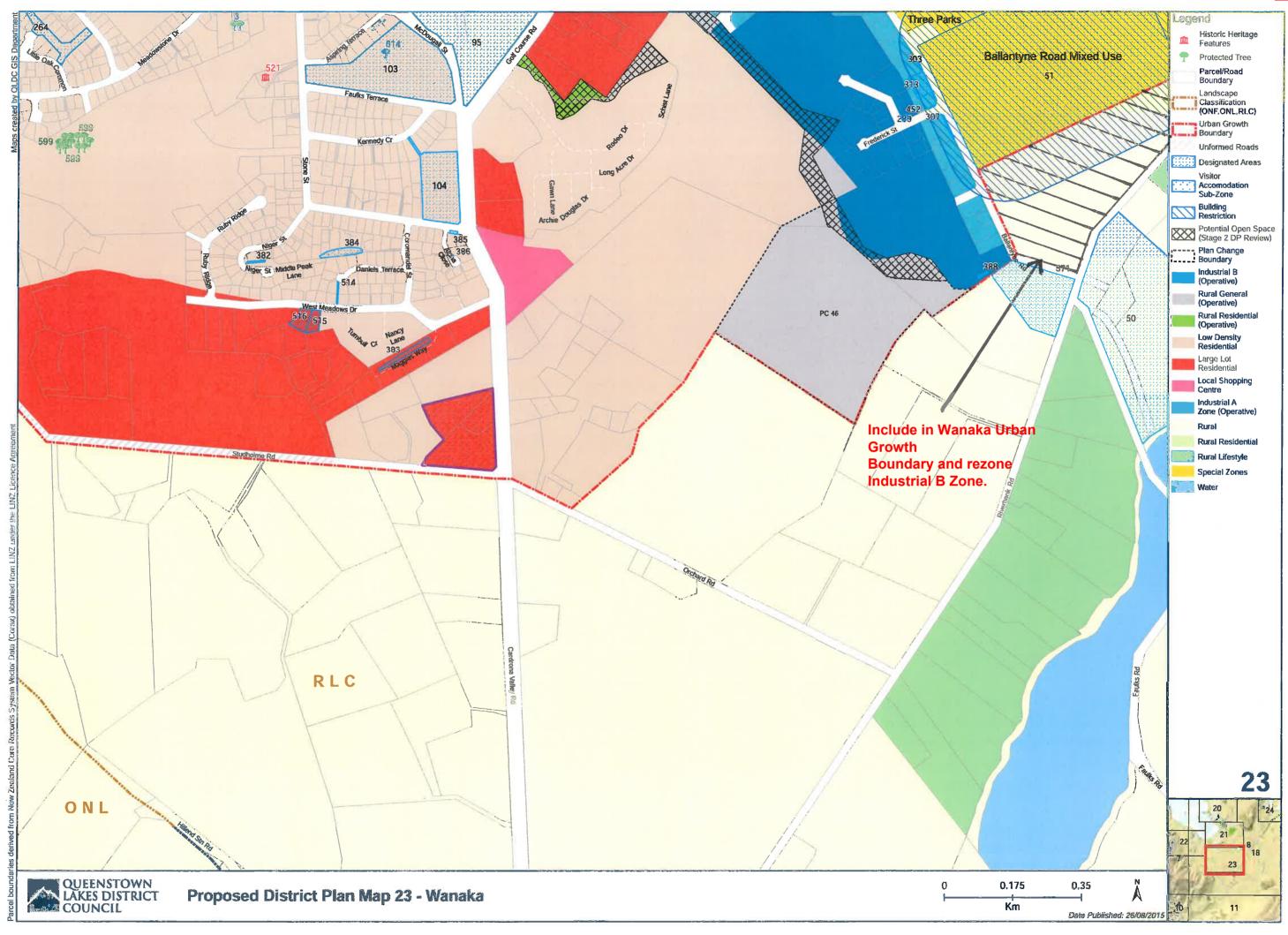


### WILLOWRIDGE ATTACHMENT 3a

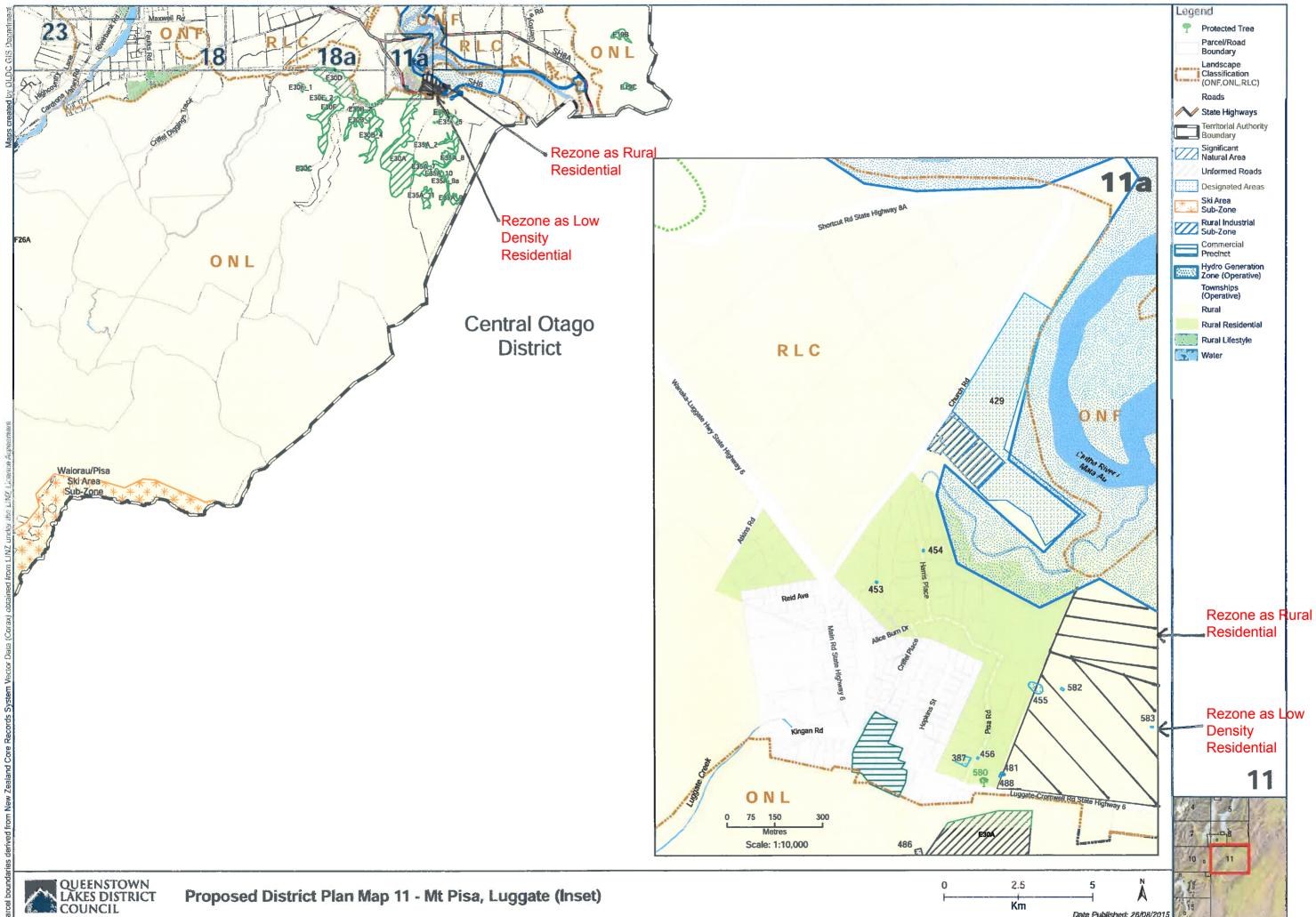


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## WILLOWRIDGE ATTACHMENT 3b



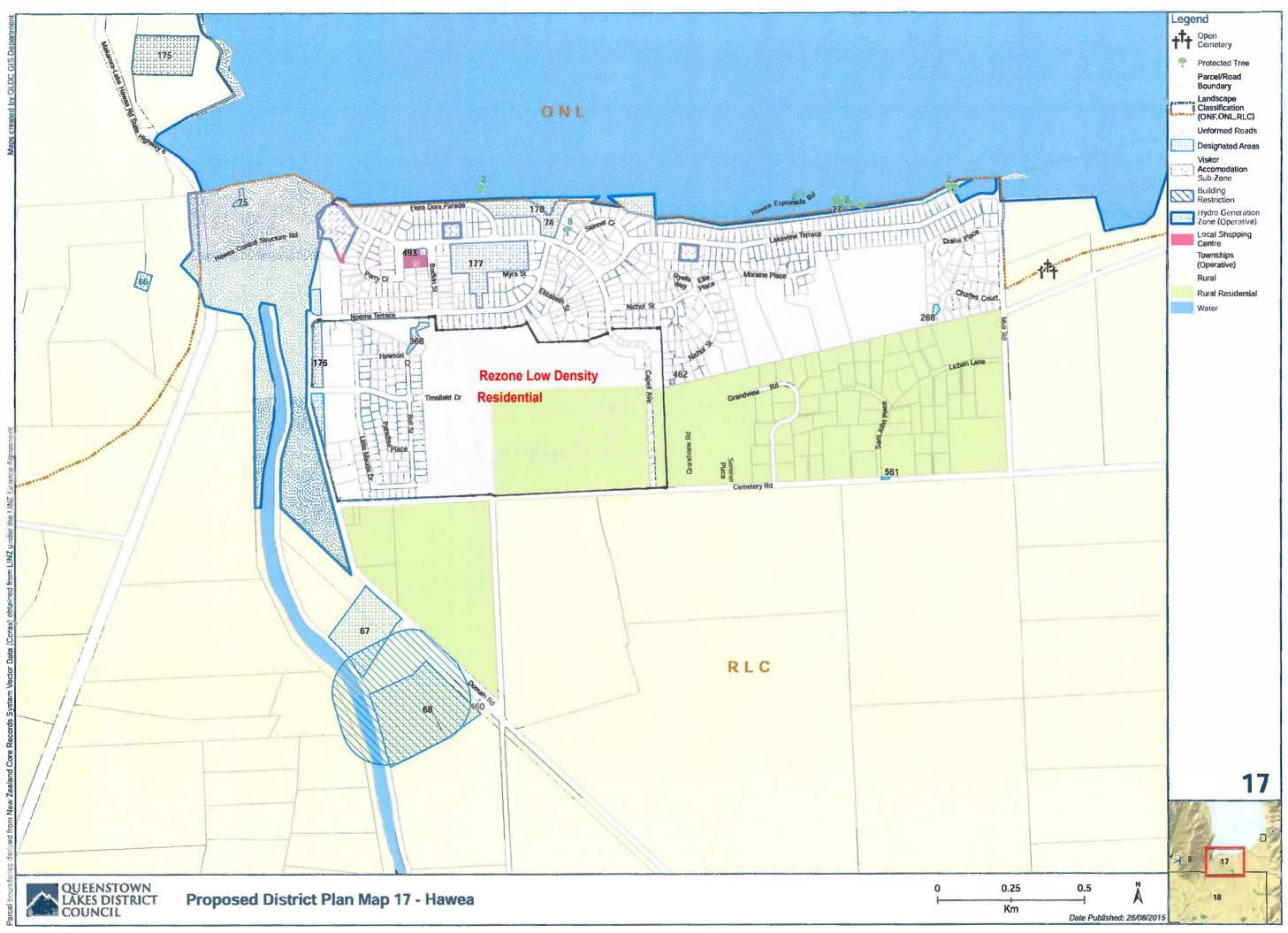




### WILLOWRIDGE ATTACHMENT 4

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# WILLOWRIDGE ATTACHMENT 5 249