

- To:** Queenstown Lakes District Council
- Address:** Sent via email to: pdpsubmission@qldc.govt.nz
- Name of submitter:** WELL SMART INVESTMENT HOLDING (THOM) LIMITED (**Well Smart**)
- Trade Competition:** Well Smart cannot gain an advantage in trade competition through this submission. Well Smart is directly affected by an effect of the subject matter of the submission: (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition.
- Submitter interests:** Well Smart owns two areas of land subject to the proposal, one zoned Queenstown Town Centre (QTCZ) and the other High Density Residential (HDRZ). Well Smart is investing heavily into Queenstown's community through the planning and construction of high-quality hotels and serviced apartments in Queenstown, including but not limited to these two properties. Well Smart has been involved as a submitter in numerous stages of the QLDC PDP process, including the recently settled building height standards for the QTCZ.
- Specific relief sought:** Well Smart generally supports the proposed provisions, except as identified below:
- a. The non-complying status for any type of residential or visitor accommodation activity in the QTCZ, and any type of subdivision, is opposed. Irrespective of conformance with any terms or standards, residential/ and Visitor Accommodation (including high traffic generating activities) should be provided for in these zones as either permitted, controlled, RDA, or Discretionary activity status respectively.
 - b. The proposed changes to rule 12.5.9 are supported in part. Within the QTCZ (Height Precinct P1(iv)) building height above ground level should be permitted up to 16.5m, RDA between 16.5m and 24m, and Discretionary above 24m. There could also be bespoke horizontal plane standards similar to (but higher than) the operative provisions. There should be no maximum building height, with any breaches to the standards resulting in either controlled, RDA, or discretionary activity status. Buildings up to 16.5m height or compliant with horizontal height plane standards should not be allowed to be notified or served on affected parties.
 - c. The amendment to rule 12.5.8 to introduce a building height setback at upper floors is opposed.
 - d. The introduction of outlook space standards in rule 12.5.12 is opposed.
 - e. The proposed addition to policy 12.2.3.3 is opposed.
 - f. The introduction of "and outlook" in rule 9.5.1(e) is opposed.
 - g. New rules/standards 9.5.7 and 9.5.8 are opposed.
 - h. Within the HDRZ building height limits should be permitted up to 16.5m and RDA between 16.5m-20m (as proposed), but with

discretionary activity status (not non-complying) if breaching the 20m height standard.

- i. Within the HDRZ, building setback standards should be 1m from any existing or approved neighbouring building (to allow access for maintenance), not 1.5m from site boundaries.
- j. Within the QTCZ and HDRZ earthworks and construction activities should be permitted, and there should not be any restrictions on construction noise during standard working hours. If construction noise standards apply, the activity status for breaching the standards should be controlled or RDA inclusive of non-notification provisions. Applications for resource consent to breach construction standards (including construction noise) should not be allowed to be notified or served on affected parties.
- k. Within the QTCZ and HDRZ, noise standards for residential, residential visitor accommodation, and visitor accommodation activities should be less stringent (i.e. night time noise standards should apply between the hours of 0000hrs-0600hrs in all town centre zones, and between 2200hrs-0800hrs in all residential zones), and any resource consent applications for breaching noise standards should be RDA (not discretionary or non-complying) and should not be allowed to be notified or served on affected parties. Discretion should be restricted to the management of noise and vibration effects on neighbouring properties.
- l. In respect of subdivision within the QTCZ and HDRZ, the minimum allotment size and shape factor standards should not be more restrictive than the medium density zone standards. A 150m² minimum site area and 8x12 shape factor is appropriate for the HDRZ. Removal of minimum allotment size and shape factor standards for subdivision of existing or approved units (residential units, residential visitor accommodation units, and visitor accommodation units) is supported.

General Relief sought:

Well Smart requests that the proposed provisions relating to the QTCZ and HDRZ be:

- a)** Amended as sought above (including withdrawal or rejection of the provisions opposed and any consequential relief required to the design guidelines);
- b)** Except for (a) above, retained as notified, unless they are amended in a manner which aligns with this submission.

Well Smart seeks the relief referred to above or such further, more refined, additional, other or alternative relief that might give effect to this submission and/or better serve the overall objectives of the proposed district plan and the purpose and principles of the Resource Management Act 1991.

General Reasons:

The proposed provisions supported by this submission align with the NPSUD and will support appropriate urban development processes and outcomes, whereas the proposed provisions opposed by this submission will frustrate the intent of the NPSUD, will add further complexity and cost to the development process, and are not needed.

Hearings:

Well Smart wishes to be heard in support of this submission. Well Smart would appreciate the opportunity to work collaboratively with QLDC staff / advisors and other submitters to help determine the most appropriate district plan provisions.

Address for Service:

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Date:

2 October 2023