

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER OF

Queenstown Lakes Proposed District Plan –
Upper Clutha Mapping Hearing

**STATEMENT OF EVIDENCE OF IAN GREAVES
ON BEHALF THE FOLLOWING SUBMITTERS:**

591 – Varina Propriety Limited

4th April 2017

Introduction

- 1 My name is Ian Christopher Greaves. I hold the qualification of Bachelor of Applied Science (Environmental Management (Hons)) from the University of Otago. I am a full member of the New Zealand Planning Institute.
- 2 I hold the position of Resource Management Consultant at Southern Planning Group. I have over ten years' experience as a planner in roles with, Southern Planning Group, Queenstown Lakes District Council, the Environment Agency (UK) and Opus International Consultants (NZ). This experience includes over six years based as a planner in Wanaka.
- 3 Throughout my professional career, I have been involved in a range of resource consent and policy matters. I have made numerous appearances in front of hearing panels and I have also given evidence in the Environment Court.
- 4 I reside in Wanaka and I am familiar with the areas of Wanaka that I discuss within this evidence.
- 5 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Consolidated Practice Note and have complied with it in preparing this evidence. I have read the Section 32 reports and the Section 42A reports prepared by the Council officers with respect to this submission. I have considered the facts, opinions and analysis in this documentation when forming my opinions which are expressed in this evidence.

Scope of Evidence

- 6 I have been engaged by Varina Propriety Limited (Submission # 591) to present expert planning evidence in relation to the extent of the Wanaka Town Centre Zone and the extent of the Wanaka Medium Density Residential Zone contained within the Proposed District Plan "PDP". The submission included an Urban Design Assessment from Ms Jill Corson. Ms Corson has also prepared a brief of evidence for this hearing. In addition to this Mr Andrew Carr (Traffic Engineer) has prepared a brief of evidence. In addressing this submission I have relied on and have been assisted by this information. My evidence should therefore be

read alongside that material, as well as the section 42A report and the evidence presented by the Council's staff and their expert witnesses.

7 The submission seeks the following:

1. The Wanaka Town Centre Transition Overlay (WTCTO) Zone contained in the Medium Density Residential Zone is deleted and replaced with the Wanaka Town Centre Zone.

Through this evidence it is recommended that the replacement zone becomes the Wanaka Town Centre Zone (Transition Overlay). Specific objective, policies and rules are recommended to be included in the Wanaka Town Centre Zone (Chapter 13) of the PDP relating to the 'Transition Overlay' area.

2. The extension of the Medium Density Residential Zone and a Visitor Accommodation Sub-Zone over the following area:

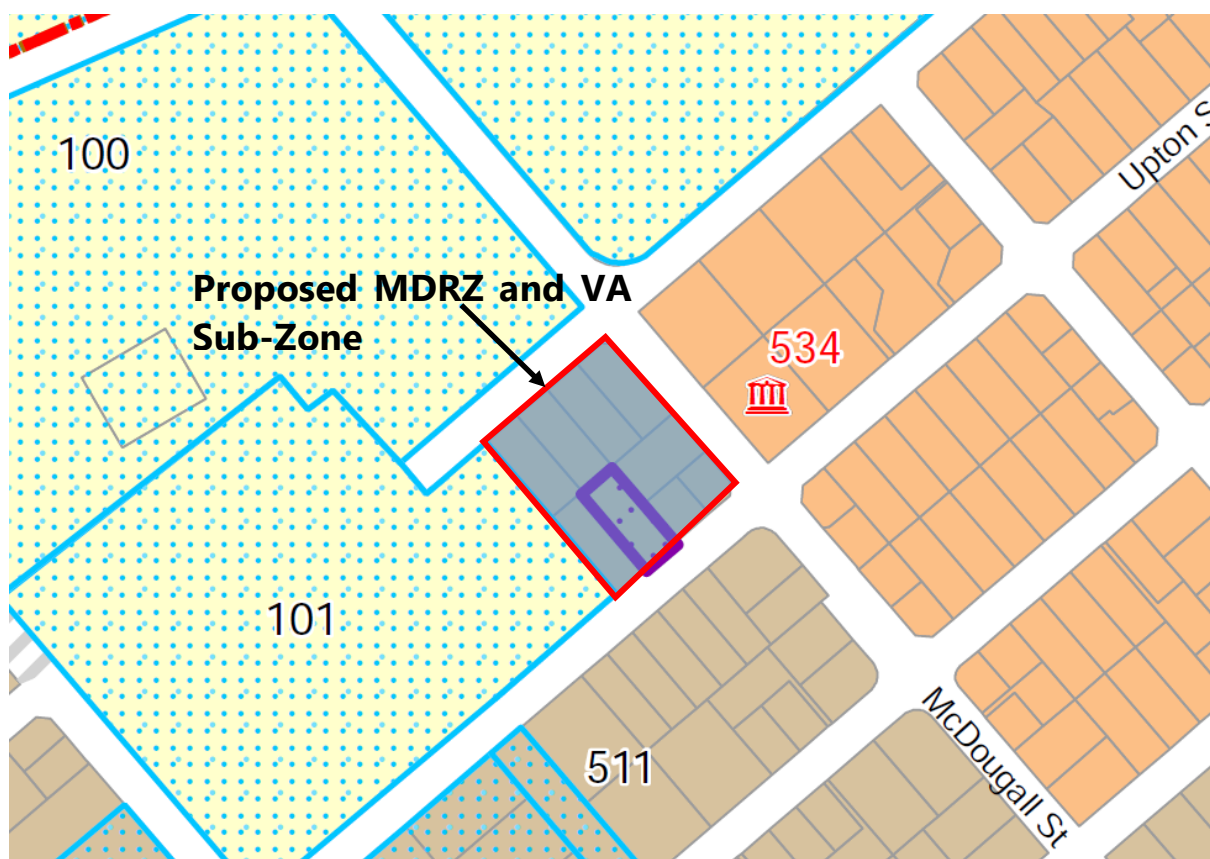


Figure 1: Proposed MDRZ and Visitor Accommodation Sub-Zone

8 My brief of evidence is set out as follows:

- Statutory Framework
- Town Centre Transition Zone
- Medium Density Residential Zone
- Part 2 Assessment
- Summary

Statutory Framework

The Resource Management Act (RMA)

9 The RMA and in particular the purpose and principles in Part 2, require Councils to promote the use, development and protection of the natural and physical resources for current and future generations in order to provide for their social, economic and cultural wellbeing. While this submission does not relate to any matters of national importance (section 6) the following section 7 matters are relevant

- a. The efficient use and development of natural and physical resources;
- b. the maintenance and enhancement of amenity values;
- c. maintenance and enhancement of the quality of the environment;

10 Section 79 provides for a review of the district plans in the manner set out in Part 1 of Schedule 1 of the RMA.

In changing the district plan, the Council is required to:

- a) “give effect to” any national policy statement
- b) “give effect to” any regional policy statement
- c) “must not be inconsistent with” a regional plan
- d) “have regard to” any proposed regional policy statement.

The National Policy Statement on Urban Development Capacity

- 11 The National Policy Statement (NPS) on Urban Development Capacity came into effect on 1 December 2016. The District Plan is required to give effect to this document.
- 12 This NPS aims to ensure planning decisions provide an effective and efficient urban environment that will meet the needs of people and communities and future generations for a range of dwelling types and locations, working environments and places to locate businesses. It also aims to ensure urban environments that, over time, develop and change in response to the changing needs of people and communities and future generations. Planning decisions are required to enable urban development which provides for the social, economic, cultural and environmental wellbeing of people and communities and future generations in the short, medium and long-term.
- 13 The provisions of this NPS are relevant in terms of the assessment of this submission. It is my opinion providing a planning framework for the area contained in the WTCTO that will have a positive outcome on the appearance and vitality of the Wanaka Town Centre and will provide for the Town Centres long term growth aligns with the provisions of this NPS. In addition, the expansion of the Medium Density Residential Zone as described in this evidence for future residential and visitor accommodation growth also aligns with the provisions of this NPS.

Operative Regional Policy Statement (ORPS)

- 14 The relevant objectives and policies of the ORPS include Objectives 9.4.1 and 9.4.3 and Policies 9.5.1 - 9.5.5. Together these strive to achieve sustainable management of the built environment in a manner that meets the needs of the community and which avoids, remedies, or mitigates adverse effects by recognising cultural relationships; promoting the efficient development and use of infrastructure (including the transport network); minimising effects of urban development on the environment (including in relation to noise, amenity, and community values); and enhancing people's quality of life (including people's health and safety).

15 In my opinion, the relief sought in this submission is consistent with this policy framework. The submission will contribute toward a compact urban core, make efficient use of resources, meet foreseeable future needs, minimise adverse effects and will result in a positive contribution to the Wanaka urban environment.

Proposed Regional Policy Statement (PRPS)

16 The PRPS was notified for public submissions on 23 May 2015, and decisions on submissions were released on 1 October 2016. It is my understanding that most of the PRPS has been appealed. The following objectives and policies (decision numbering) are relevant to this submission: Objective 4.5 and policies 4.5.1, 4.5.3, 4.5.4, 4.5.5, 4.5.6; and Objective 5.3 and Policy 5.3.3. In summary, together these objectives and policies aim to ensure that urban growth (including commercial) is well designed, reflects local character and integrates effectively with adjoining environments; and that sufficient land is managed and protected for economic production. In my opinion the relief sought in this submission is also consistent with this policy framework, with regards to contributing toward a well-designed urban core that reflects the character of Wanaka and will integrate appropriately with the surrounding receiving environment.

Higher Order Proposed District Plan (PDP) Provisions

17 The Strategic Direction Chapter of the PDP encourages a planning framework for the Queenstown and Wanaka central business areas that enables quality development and enhancement of the centres as the key commercial hubs of the District. This chapter also promotes growth in the visitor industry and encourages investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka central business areas. This chapter encourages a wide variety of activities and promotes sufficient capacity within the commercial areas to accommodate business growth and diversification. A built environment is also encouraged that ensures our urban areas are desirable and safe places to live, work and play. In my opinion the relevant provisions of the Strategic Direction chapter are:

3.2.1 Goal - *Develop a prosperous, resilient and equitable economy.*

Objective 3.2.1.1 *Recognise, develop and sustain the Queenstown and Wanaka central business 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 central business 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 central business 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 central business areas.*

Objective 3.2.1.3 *Enable the development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.*

Policies

3.2.1.3.1 *Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.*

3.2.1.3.2 *Encourage economic activity to adapt to and recognise opportunities and risks associated with climate change and energy and fuel pressures.*

3.2.3 Goal - *A quality built environment taking into account the character of individual communities*

Objective 3.2.3.1 *Achieve a built environment that ensures our urban areas are desirable and safe places to live, work and play.*

Policies

3.2.3.1.1 *Ensure development responds to the character of its site, the street, open space and surrounding area, whilst acknowledging the necessity of increased densities and some change in character in certain locations.*

3.2.3.1.2 *That larger scale development is comprehensively designed with an integrated and sustainable approach to infrastructure, buildings, street, trail and open space design.*

18 I support the rationale and intent of these higher order provisions particularly promoting growth and good design outcomes within the District's key commercial centres. As will be discussed in this evidence, setting appropriate planning provisions for the area contained in WTCTO is imperative to facilitate positive building and streetscape outcomes which will have a positive contribution to the character and vitality of the Wanaka Town Centre. It is also fundamental that appropriate areas for growth (in the appropriate form) are provided for within the Wanaka Town to ensure key future development opportunities are not directed to outlying zones that could undermine the role and function of the Wanaka Town Centre. In my opinion, the proposed rezoning of the WTCTO to Wanaka Town Centre Zone (Transition Overlay) more appropriately gives effect to this policy framework by contributing toward the enhancement of Wanaka Town Centre as the central business area, providing future growth capacity in the Wanaka Town Centre and contributing to positive design outcomes.

19 The Urban Development Chapter of the PDP is also relevant where it encourages a compact and integrated urban form that limits the lateral spread of urban areas whilst coordinating development with infrastructure and servicing. The following policies are relevant to this submission:

4.2.3.2 *Enable an increased density of residential development in close proximity to town centres, public transport routes, community and education facilities.*

4.2.3.3 *Low density development does not compromise opportunities for future urban development*

4.2.3.4 *Urban development occurs in locations that are adequately serviced by existing public infrastructure, or where infrastructure can be efficiently upgraded.*

Wanaka Town Centre Character Guidelines

20 The Wanaka Town Centre Character Guidelines were prepared by the Council in 2011 to provide guidance to developers, design professionals and the Council on Town Centre development. The Guideline is referenced in policy 13.2.4.1 on the Wanaka Town Centre Chapter of the PDP. The Guideline was due to be

reviewed by Council in 2016 (five yearly) but I understand this work has yet to take place.

21 Section 3.1 of the Guideline discusses Brownston Street and acknowledges its existing historical residential form and the residential interface with the Town Centre. The Guideline does not explicitly comment on what the future built form of Brownston Street should look like however.

22 Section 2.2: Built Form and the Active Edge of the Guideline discusses the importance of the edge between buildings and the street. The Guideline outlines that the '*vibrancy, vitality and commercial viability of an urban area is closely related to the design of this edge, the front façade*'. The Guideline encourages building to be located on the front boundary with articulated forms. Smaller buildings are encouraged to occur in front of larger buildings and car parking areas. At ground floor level, between 50% and 70% of front façades are encouraged to be glazed. The creation of an active edge between development in the area of the WTCTO and the adjoining street is one of the key outcomes sought within this submission.

Town Centre Transition Zone

- Overview

23 In this section of my evidence I address the appropriateness of the Wanaka Town Centre Transition Overlay (WTCTO) (contained within the Medium Density Residential Chapter). I support the area of this zone and its intent to provide for the managed expansion of the Wanaka Town Centre but I consider that the zone is more appropriately zoned Wanaka Town Centre Zone (Transition Overlay) with specific controls managing design, access, car parking and the interface with the adjoining residential zone. I recommend the inclusion of a new objective, associated policies and rule provisions into Chapter 13 of the PDP to manage these effects (discussed below).

24 The area contained within the WTCTO currently exhibits a strong commercial element with many of the old residential properties containing commercial uses. For example Adventure Consultants, Aspiring Dentists and the Otago Daily Times are all situated presently within this zone. Paradiso Cinema is another example of a reasonably large scale commercial activity within this zone.

25 Council through their Section 32 analysis have recognised that the WTCTO is appropriate for the 'managed' expansion of the Wanaka Town Centre in recognition of the existing creep of commercial activities into this area. I agree with this assessment.

26 The issue at hand here is not the type of commercial activities provided for in the WTCTO but the controls around building forms. I believe it is appropriate to provide a planning framework in the area of the WTCTO that will have a positive contribution to the function, appearance and vitality of the Wanaka Town Centre and provide for long term commercial growth within the Town Centre. The proposed rule framework of the WTCTO in my opinion does not currently achieve this. The proposed WTCTO as notified will consume Wanaka's best remaining land within direct proximity to Wanaka's Town Centre with poorly designed and inefficiently laid out commercial development. As a result key commercial and visitor accommodation growth may be forced into outlying zones in Wanaka that have no direct relationship to the Wanaka Town Centre and that provide little contribution to the Town Centre's function and vitality, for example North Lake or Three Parks. I consider the proposed rezoning (Wanaka Town Centre Zone (Transition Overlay)) is the most effective way of addressing the Strategic Direction Chapter of the PDP on making the most of growth opportunities within Wanaka and promoting good future design outcomes.

- Urban Design Evidence / Effects

27 Ms Corson has set out within her evidence the key findings with respect to urban design outcomes for the area contained in WTCTO. For the purposes of my evidence, I accept and adopt Ms Corson's assessment. I do not intend to repeat those findings, however will draw from them where, in my opinion, there are relevant planning issues that require consideration. I acknowledge that Council did not seek any urban design advice nor did the Reporting Officer address any urban design matters within the Section 42a report. In my view this is a fundamental gap with regards to the conclusion of the Section 42a report.

28 As notified the PDP whilst enabling commercial activities within WTCTO the built form outcomes are limited to the bulk and location requirements of the MDR

zone. The WTCTO is supported by the following objective and policy provisions within the MDR chapter:

8.2.12 Objective – *The Wanaka Town Centre Transition Overlay enables non-residential development forms which support the role of the Town Centre and are sensitive to the transition with residential uses.*

Policies

8.2.12.1 *Enable non-residential uses to establish in a discrete area of residential-zoned land adjoining the Wanaka Town Centre, where these activities suitably integrate with and support the role of the Town Centre.*

8.2.12.2 *Non-residential and mixed use activities provide a quality built form which activates the street, minimises the dominance of parking and adds visual interest to the urban environment.*

8.2.12.3 *Allow consideration of variances to Rules for site coverage, setbacks and parking where part of an integrated development proposal which demonstrates high quality urban design.*

29 The following rules will also apply to all buildings within the WTCTO:

Building Setback from Roads – 3m (Standard 8.5.8)
Building Boundary Setbacks: Side and rear boundaries 1.5m (Standard 8.5.8)
Continuous Building Length: The continuous length of any building facade above one storey shall not exceed 16m. (Standard 8.5.9)
Landscape permeable surface coverage: At least 25% of the site are shall comprise landscape (permeable) surface. (Standard 8.5.7)
Building Coverage: 45%.

(Standard 8.5.4)

Building Height: 7m permitted.

(Standard 8.5.1)

Recession Plane

- Northern Boundary: 2.5m and 55 degrees;
- Western and Eastern Boundaries: 2.5m and 45 degrees;
- Southern Boundary: 2.5m and 35 degrees;
- Gable and roof ends may penetrate the building recession plane by no more than one third of the gable height.

(Standard 8.5.6)

Window Sill heights: Window sill heights above the first storey shall not be set lower than 1.5m above the floor level where the external face of the window is within 4m of the site boundary.

(Standard 8.5.10)

30 Ms Corson's opinion is that the proposed planning provisions as outlined above would have a negative urban design effect on future development within this area, primarily because future development would have residential characteristics that creates an unbalanced street environment along Brownston Street and would diminish the entry precedent into the Wanaka Town Centre. Paragraphs 55 - 58 of Ms Corson's evidence provides a detailed analysis of the positive urban design outcomes that would result with the inclusion of the WTCTO area within the Wanaka Town Centre Zone (Transition Overlay). Primarily this relates to creating a vibrant entrance into the Wanaka Town Centre and a balanced street environment.

31 Ms Corson also identifies that there appears to be a lack of guiding vision for the WTCTO by recognising that commercial activities within this area need to be catered for but not wanting to change the existing residential characteristics of this area. I agree with this opinion and I consider that the planning process for assessing development within the Wanaka Town Centre Zone under the PDP provides Council with greater control on the overall urban design response for the

area. Whilst I accept the proposed WTCTO planning provisions do provide reference to urban design outcomes I do not believe the assessment of a resource consent application under these provisions would be given the same rigour of assessment for a building under the Town Centre provisions. Primarily I take this view because the Town Centre planning provisions (Objective 13.2.4 and associated policies and Rule 13.4.4) provide greater scope to address the key design elements of the building and how buildings define and relate to the streetscape and other public spaces. These provisions also make specific reference to the Wanaka Town Centre Character Guidelines which are not referenced within the provisions of the MDR zone. It is relevant to note the role of the Wanaka Urban Design Panel who generally provide a formal design review for all developments within the Wanaka Town Centre.

32 Ms Corson's vision for the Brownston Street commercial sites is the inclusion of a rear lane for access. I agree that a rear lane accessing these commercial sites is the correct response and will reduce a proliferation of commercial access points onto Brownston Street and better define the relationship between the sites and the street. I have considered whether the concept of the rear lane needs to be specifically referenced within the provisions of the District Plan. It is my opinion that the practicality of creating this rear lane space is best considered at a resource consent level rather than with a specific rule in the plan. At a resource consent level, a developments overall design response can be fully considered with appropriate consideration given to the layout of adjoining development. I take this view given the number of sites in the area of the WTCTO with many different owners that are unlikely to be developed all at once. Forcing the rear lane outcome as District Plan rule becomes reliant on those sites at the ends of the blocks developing first before sites within the middle of a block could develop. I do not consider this to be practical or efficient. A specific policy with reference to limiting access points onto Brownston Street is proposed however. This is also in addition to a recommended 5m building setback rule from adjoining residential sites that will also assist in creating space for a rear lane.

33 In consideration of Ms Corson's evidence and the strategic planning provisions that relate to this submission that promote commercial growth and positive design outcomes within the District's key commercial centres it is my opinion that there is strong planning basis to replace the WTCTO with the Wanaka Town Centre Zone (Transition Overlay).

- Traffic and Car Parking Evidence / Effects

34 Mr Carr has set out within his evidence the key findings with respect to traffic and car parking outcomes for this submission. For the purposes of my evidence, I accept and adopt Mr Carr's assessment. Mr Carr's opinion differs to that of Ms Wendy Banks who has provided traffic evidence for the Council. Mr Carr's opinion is the proposed WTCTO in the notified PDP will have adverse effects on the function of the adjoining road network, in Mr Carr's opinion these effects will be less under the Wanaka Town Centre Zone (Transition Overlay) provisions.

35 The Section 42a report correctly identifies that a change from the WTCTO to Wanaka Town Centre Zone will remove the requirement for sites to provide onsite car parking. It is clear to me from Mr Carr's evidence that both the WTCTO or the Wanaka Town Centre Zone will generate an increase in car parking demand in central Wanaka. The key consideration in my opinion is how this car parking demand is dealt with. Under the provisions of the WTCTO Mr Carr correctly points out that most if not all of this car parking demand will be catered for on individual development sites with multiple commercial access points onto the surrounding road network. Mr Carr considers this to be an adverse outcome from a traffic perspective as it would create multiple potential conflict points as well as an inefficient traffic outcome due to drivers circulating to look for vacant parking space.

36 What can be drawn from Mr Carr's evidence is there is an opportunity on how car parking demand and vehicle access can be managed under the Wanaka Town Centre Zone (Transition Overlay) to improve the efficiency and functionality of the surrounding road network. In my opinion the correct approach is to promote the shared use of existing and new parking facilities alongside complementary strategies to promote other travel modes and to reduce overall demand for car travel. I consider this approach offers a number of environmental benefits including more attractive and pedestrian-friendly urban design, encourages use of alternatives transport modes such as cycling, walking and carpooling (and possibly in the future public transport) and the transportation benefits outlined in Mr Carr's evidence.

37 To achieve this outcome there is no ability to make changes to the Transportation Chapter of the Operative District Plan as this did not form part of Stage 1 of the

District Plan review. Therefore I recommend changes to Chapter 13 (Wanaka Town Centre Zone) of the PDP to incorporate consideration of traffic / car parking outcomes through the resource consent process for future development in the Wanaka Town Centre Zone (Transition Overlay). It is my recommendation that this is reflected with new policy provisions and an additional matter of discretion under Rule 13.4.4 (changes outlined below).

38 With these provisions in place a balanced approach to traffic / car parking can be considered on a case by case basis at a resource consent level. The provisions provide a clear expectation that traffic / car parking outcomes are matters that developers must consider and respond to. However, this response should be assessed in an integrated manner with adjoining development, providing a realisation to the benefits discussed above. For example the concept of a rear lane would be an effective and appropriate solution to access that could be negotiated between developers.

- Residential Amenity Effects

39 An important aspect of this submission point is the potential amenity effects (including loss of views and privacy, dominance, shading and noise effects) on adjoining residential neighbours. In my opinion with the right District Plan provisions in place these effects can be suitably mitigated.

40 Most if not all directly adjoining properties sit at a similar elevation to those sites within the WTCTO. The adjoining residential sites do not gain uninterrupted views of Wanaka's surrounding landscapes. The proposed submission will provide for an increase in buildings heights from 7m within the WTCTO Zone to 8 – 10m (eave verse ridgeline) within the Wanaka Town Centre Zone (Transition Overlay). This may result in some reduction in views of the surrounding mountainous landscape from certain private locations to the south. However, the extent of this effect in my opinion will not be significant in the context of the sites within Wanaka's commercial centre and a District Plan that encourages investment in lifting the scope and the quality and attractiveness of buildings within the central business areas. In my view the greater potential amenity effects relate to privacy, shading and dominance.

41 In terms of potential privacy, shading and dominance effects a setback distance of 5m from adjoining residential sites is proposed to ensure that any commercial

buildings are sufficiently separated from adjoining residential sites. In addition to this the PDP recession plan Rule 13.5.1.1 that sets a 34 degree recession plane for town centre development adjoining residential sites would also apply. In my opinion the combination of these controls will ensure future commercial buildings will not dominate or adversely overshadow adjoining residential sites. I recognise that these effects will not be completely eliminated but in the context of the adjoining residential sites located within the immediate vicinity of Wanaka's commercial centre these controls will provide a high level of protection whilst promoting a high quality and attractive built form environment.

42 The PDP Wanaka Town Centre rules provide a maximum day and night time noise limit that is 10db higher than the residential rules for sound received in adjoining residential zones from town centre activities. It is my recommendation that these noise limits do not apply for Wanaka Town Centre Zone (Transition Overlay). I believe an appropriate outcome is applying the PDP residential day and night time noise limits for activities within Wanaka Town Centre Zone (Transition Overlay). The recommendation recognises this areas transitional status and its close proximity with adjoining residential neighbours. With this noise rule in place any disruptive noise effects can be avoided ensuring a suitable amenity is maintained for adjoining residents.

43 Overall, with the rules as discussed above (and outlined below) I believe the interface between the proposed zone and the adjoining residential sites will be appropriately managed and the amenity of the adjoining residents will be suitably protected.

- *Demand for Commercial Floor Space*

44 I acknowledge that the proposed Wanaka Town Centre Zone (Transition Overlay) will result in a higher intensification of commercial floor space than what is currently anticipated under the WTCTO. As a long term growth opportunity I do not perceive this to be a negative outcome. I believe it is important that a major portion of future commercial and visitor accommodation growth is encouraged to take place within the Wanaka Town Centre contributing to its function and vitality. If this does not occur and a large portion of new commercial and visitor accommodation growth takes places outside of the Wanaka Town Centre I consider that the Town Centres function as the core commercial centre could be undermined. I consider that the proposed submission will appropriately achieve

long term growth opportunities for the Wanaka Town Centre, create superior urban design outcomes and encourage the Wanaka Town Centres sustainable and efficient ongoing development.

- Recommend Changes to the PDP

45 On the basis of the expert evidence and opinions outlined above it is my recommendation that the WTCTO is removed from the Medium Density Residential Chapter of the PDP and incorporated into the Wanaka Town Centre Chapter. The zone should retain its status as a transition zone recognising the transitional phase this area will experience over the life of the PDP. I therefore recommend that the WTCTO is zoned Wanaka Town Centre Zone (Transition Overlay). The following changes are recommended:

46 A new objective and policies should be incorporated in the Wanaka Town Centre Chapter of the PDP that states:

Objective – *New commercial and visitor accommodation opportunities are provided for within the Wanaka Town Centre Transition Overlay in a manner that contributes to the Town Centres vitality and also safeguards the amenity of the adjoining residential zones.*

Policies

- i. Commercial buildings to provide a quality built form which activates and integrates with the street environment and complements the existing patterns of development within the Town Centre.*
- ii. Minimise conflicts between the Wanaka Town Centre Transition Overlay and the adjoining residential zone by avoiding high levels of night time noise being generated within the zone and controlling the height, setback distances and design of buildings at the zone boundary*
- iii. To promote an integrated approach to traffic management in the Wanaka Town Centre Transition Overlay including minimising vehicle access and car parking.*

- iv. *To recognise that an increase in car parking demand will be created by development in the Wanaka Town Centre Transition Overlay and promote the shared use of existing and new parking facilities for new development alongside complementary strategies to promote other travel modes and to reduce overall demand for car travel.*

47 It is my recommendation that all existing rules of the Wanaka Town Centre Chapter of the PDP specified in Table 13.4 apply to the Wanaka Town Centre Zone (Transition Overlay) with the exception of the following changes (added text underlined):

13.4.4 Buildings

**Discretion is restricted to consideration of all of the following: external appearance, materials, signage platform, lighting, impact on the street (to be guided by the Wanaka Town Centre Character Guideline 2011), ~~and natural hazards and~~ car parking demand, access, loading and traffic generation in the Wanaka Town Centre Transition Overlay to ensure that:*

- *The design of the building blends well with and contributes to an integrated built form;*
- *The external appearance of the building is sympathetic to the surrounding natural and built environment. The use of stone, schist, plaster or natural timber is encouraged;*
- *The views along a street or of significant view-shafts have been considered and responded to;*
- *The building facade provides an active interface to open space on to which it fronts, and the detail of the facade is sympathetic to other buildings in the vicinity, having regard to:*
 - a. *Building materials;*
 - b. *Glazing treatment;*
 - c. *Symmetry;*
 - d. *External appearance;*
 - e. *Human scale; and*
 - f. *Vertical and horizontal emphasis; and*
- *Storage areas are appropriately located and screened; and*

- *Where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: an assessment by a suitably qualified person is provided that addresses the nature and degree of risk the hazard(s) pose to people and property, whether the proposal will alter the risk to any site, and the extent to which such risk can be avoided or sufficiently mitigated.*
- *Car parking demand, access, loading and traffic generation in the Wanaka Town Centre Transition Overlay are considered in an integrated manner with the Town Centre Zone and responded to.*

13.5.1 Setbacks and sunlight access – sites adjoining a Residential zone

13.5.1.1 Buildings shall not project beyond a recession line constructed at an angle of 34° inclined towards the site from points 3m above any Residential Zone boundary.

13.5.1.2 Where a site adjoins a Residential Zone all buildings shall be set back not less than 3m with the exception of the Wanaka Town Centre Transition Overlay where the setback shall be 5m.

13.5.10 Noise

Wanaka Town Centre Transition Overlay

13.5.10.6 Sound from activities in the Wanaka Town Centre Transition Overlay Zone shall not exceed the following noise limits at any point within any residential zone:*

- a. Daytime (0800 to 2200hrs) 50 dB LAeq(15 min)*
- b. Night-time (2200 to 0800hrs) 40 dB LAeq(15 min)*
- c. Night-time (2200 to 0800hrs) 75 dB LAFmax*

or the following limits any point within this zone and the Wanaka Town Centre Zone:

- a. Daytime (0800 to 2200hrs) 60 dB LAeq(15 min)*

b. Night-time (2200 to 0800hrs) 50 dB LAeq(15 min)

c. Night-time (2200 to 0800hrs) 75 dB LAFmax

*measured in accordance with NZS 6801:2008 and assessed in accordance with NZS 6802:2008

- Section 32AA Evaluation

48 The following summary evaluation has been prepared under section 32AA of the Act to supplement the proposed amendments to the clauses discussed above. In accordance with s.32AA(1)(c) this evaluation has been undertaken at a level of detail which corresponds to the scale and significance of the changes.

Costs	Benefits	Effectiveness & Efficiency
<p>The proposal will distribute new development over a wider area of the Wanaka Town Centre Zone rather than consolidate it to the existing extent of the zone. This may result in short term effects due to inconsistent building heights and blank walks where new development adjoins undeveloped sites.</p> <p>Greater building heights and reduced setbacks may result in more shading effects on the surrounding Streets and adjoining commercial sites within the zone.</p>	<p>Improved urban design outcomes. The proposed changes will give visual balance to Browston Street, spatial definition and a stimulating town entrance.</p> <p>Will encourage the redevelopment of WTCTO in a more efficient manner resulting in better utilisation of sites for commercial purposes.</p> <p>Will provide long term growth provisions for town centre development.</p> <p>The amenity of adjoining residential neighbours is</p>	<p>The proposed changes will be effective and more efficient at implementing Objective 13.2.1 and 13.2.1 by ensuring that there is sufficient growth capacity in the Wanaka Town Centre Zone to ensure it remains the principal focus for commercial and visitor activities in the Upper Clutha.</p> <p>These changes will also be equally effective and efficient at implementing Objective 13.2.3 regarding retaining a low quality human scale.</p>

<p>Adjoining residential properties may take more comfort in the proposed WTCTO provisions that restrict built form outcomes to residential requirements to protect their amenity values.</p>	<p>protected through robust District Plan set back, height to boundary and noise provisions.</p> <p>Improved efficiency and safety of the surrounding road network.</p>	<p>The changes will also be more effective and efficient at implementing Objective 13.2.4 regarding quality urban design outcomes for the reasons listed under the benefits.</p> <p>These changes will also be more effective and efficient at implementing Objective 13.2.5 regarding minimising effects outside of the zone with appropriate building and noise controls managing the interface with the adjoining residential zones.</p>
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- Section 42a Report

49 In consideration of the evidence supplied by Ms Corson and Mr Carr I disagree with the conclusions of the Council's Section 42a report. I believe the Reporting Officers approach in assessing this submission failed to consider all costs and benefits including the identified traffic and parking matters which is something to be weighted and assessed as part of a rounded consideration of merit rather than as an automatic rejection. The central position of this submission relates to the positive urban outcomes for the Wanaka Town Centre that will be created. The Reporting Officer provides limited analysis with regards to this matter which in my opinion is a gap in the Council's Section 42a report.

50 When a full planning assessment is undertaken in breadth of Section 32 of the Act it is my opinion that the conclusions reached would be very different to that of the Reporting Officer. I have identified within this evidence that the proposed zoning and associated provisions are the most efficient and effective way to achieve the proposed Objectives and Policies of the Plan. The costs and benefits

of the proposal have also been thoroughly identified within this evidence which when weighted and assessed as part of a rounded consideration I consider the proposed submission should be accepted.

- Summary Town Centre Transition Zone

51 In my opinion there are real benefits in rezoning the WTCTO to Wanaka Town Centre Zone (Transition Overlay). This position is supported by Ms Corson and Mr Carr. Ms Corson considers this zoning approach would give visual balance, spatial definition and a stimulating town entrance along Brownston Street. Mr Carr has considered the traffic and parking effects of the submission and concluded that the proposed Town Centre Zone better achieves both efficient and safety on the surrounding roading network.

52 Specific planning provisions have been recommended to be included in the PDP to manage design, traffic / car parking outcomes and the interface between the proposed zone and the adjoining residential sites. With these provisions in place benefits will be created and the amenity of the adjoining residential sites will be suitably protected.

53 The zone change is the first step in the approval process for future development. The PDP provisions for the Wanaka Town Centre Zone sets up a consenting process which I am confident will ensure that all relevant urban design and traffic issues (for example) are given adequate consideration.

54 Overall, I consider the proposed rezoning as requested within this submission is the most effective way of addressing the Strategic Direction Chapter of the PDP on making the most of growth opportunities within Wanaka and promoting good future design outcomes. It is my opinion that the zone change, when assessed against the requirements of s32, is consistent with achieving the purpose of the RMA.

Medium Density Residential Zone

- Overview

55 In this section of my evidence I address the appropriateness of the Low Density Residential (LDR) Zoning on the corner of Upton, McDougal and Brownstown Street, Wanaka as shown in Figure 1 of this evidence. The submission from

Varina requests that this block is zoned Medium Density Residential (MDR) overlaid with a Visitor Accommodation Sub-Zone. I understand visitor accommodation activities have been withdrawn from Stage 1 of the District Plan review therefore this evidence focuses on the MDR Zoning.

56 The rationale for this submission is the proposed LDR zoning of this block does not accurately reflect the nature of existing development contained within the block. The main example is 181, 185 and 37 McDougal Street which contain Peak Apartments and associated facilities that are more akin to a higher density residential environment.

- Urban Design Evidence

57 Ms Corson considers that it is unlikely that the sustainable long term use of this block is as an LDR zone given the sites strategic value close to the Wanaka Town Centre and the Lake. Ms Corson also considers that from an urban design perspective it is appropriate to continue the MDR zone for the full length of Brownston Street terminating at the Wanaka camp ground.

- Traffic Evidence

58 Mr Carr's evidence concludes that the roading network in the vicinity of this submission site can accommodate a substantial increase in traffic of a magnitude that is far greater than what would be generated by the proposed MDR zone. In summary Mr Carr sees no traffic reasons that should prevent this requested rezoning.

- Planning Assessment

59 The key difference between the LDR Zone and the MDR zone is a small increase in the permitted residential density (300m² net area per residential unit verses 250m² net area per residential unit) and a small reduction in the minimum boundary setback requirements. In my opinion the potential adverse effects associated with the extension of the MDR zone are minor. McDougal Street acts as an important entrance into Wanaka from the Cardrona Valley. Enabling medium density development in this location in my opinion is in keeping with the character of this area recognising the existing level of development within the new zone and recognising the proposed MDR zone on the north eastern side of

McDougal Street. I also consider this zone extension responds appropriately within its setting in close proximity to the Wanaka Town Centre. In many ways adding attractive medium density built form developments in this area will add to the character and vibrancy of this location. As a result the development outcomes enabled by the MDR zone for this area will not create adverse effects on the character of the area or the wider locality.

60 Given the minor differences between the LDR zone and MDR zone and the positive design outcomes it is my opinion that any effects in terms of the rezoning will be minor and not dissimilar to that created by the proposed LDR zone. I also consider the proposed rezoning as requested within this submission is the most effective way of addressing the Strategic Direction and Urban Development Chapter of the PDP on making a compact and integrated urban form.

- Section 42a report

61 I support the conclusions of the Section 42a report with respect to the proposed MDR zone. I have not considered the merits of the visitor accommodation zoning as it is my understanding these provisions have been withdrawn for consideration under the PDP. I understand this will be addressed at Stage 2 of the District Plan review.

- Summary MDR Zone

62 The sites subject to this rezoning are within a strategic development location that is in close proximity to the Wanaka Town Centre and the Lake which is ideally suited to creating a greater supply of residential and visitor accommodation options within Wanaka. An extension of the MDR zone as requested in this submission in my opinion is an appropriate response in managing urban development. This position is supported by Ms Corson and Mr Carr. In my opinion the proposed rezoning delivers on the longer term goal of delivering a compact urban form that is consistent with and gives effect to the Councils Strategic Direction Chapter, the Proposed Urban Development Chapter, and the Proposed Regional Policy Statement. It is my opinion that the zone change, when assessed against the requirements of s32, is consistent with achieving the purpose of the RMA.

Part 2 Assessment

63 Section 32(1)(a) of the RMA requires an examination to the extent that a new objective is the most appropriate way to achieve the purpose of the RMA.

64 With effective land use management controls in place, it is my view that the rezoning discussed in this evidence will be consistent with Section 5 which requires the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while safeguarding of the life-supporting capacity of air, water, soil and ecosystems.

65 Development enabled by the rezoning will be controlled and managed to ensure that the environmental effects arising as a result of this zone change are appropriately avoided, remedied or mitigated.

66 In terms of other relevant matters inherent in Part 2 of the Act, it is my assessment that there are no relevant section 6 matters. In my opinion the submission has appropriate regard for section 7 matters. The submission will maintain amenity values and maintain and enhance the quality of the environment by promoting:

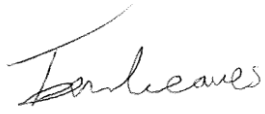
- The efficient use and development of natural and physical resources;
- the maintenance and enhancement of amenity values;
- maintenance and enhancement of the quality of the environment; and

67 In terms of assessing the submission against section 8, there are no known Treaty principles that will be affected by this zone change.

68 It is my opinion that the relief sought in this submission achieves the purpose of the RMA.

Conclusion

69 Overall I consider the proposed zone changes requested in this submission are consistent with meeting the purpose of the RMA, having considered the relevant matters inherent in Section 32.

A handwritten signature in black ink, appearing to read "Ian Greaves". The signature is written in a cursive style with a prominent initial "I".

Ian Greaves

4 April 2017