

Queenstown Lakes District Council

Proposed District Plan – Stage 2 Submission Form

Clause 6 of First Schedule, Resource Management Act 1991
FORM 2

Correspondence to:
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For office use only

Submission No:

Receipt Date:

1. Submitter details:

Full Name of Submitter: G WILLS & T BURDON (the “Submitter”)
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QUEENSTOWN
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Contact Person: J Brown / A Hutton

2. Scope of submission:

2.1 This is a submission to the Queenstown Lakes District Proposed District Plan (“PDP”) Stage 2, notified 23 November 2015

2.2 Summary and purpose of the submission:

The Submitters oppose the rezoning of their property to the Wakatipu Basin Rural Amenity Zone (**WBRAZ**) and seeks that the land, together with other land south of Millbrook, west of the Arrowtown-Lake Hayes Road, west of the Waterfall Park Zone and north of Waterfall Park Road (the **Land**) is rezoned to the Wakatipu Basin Lifestyle Precinct (**WBLP**), subject to various modifications to the WBLP set out in this submission.

In the alternative, the Submitter seeks that the Land is rezoned to the Rural Residential Zone.

The Submitter generally supports the proposed earthworks Chapter 25, insofar as it relates to the Rural Residential / Rural Lifestyle Zone and the WBLP.

The details of the submission and the reasons for the submission are set out in Parts 3.1 – 3.5 below.

2.3 The specific provisions that the submission relates to are:

- (a) Planning maps, including maps 13d and 26;
- (b) Chapter 24 – Wakatipu Basin;
- (c) Chapter 27 – Subdivision (Variation)

- (d) Chapter 25 – Earthworks;
- (e) Chapters 3 and 6 (Stage 1), and Chapter 6, Rule 6.4.1.3 (Variation)
- (f) Any other provisions relevant to this submission.

3. Submission

3.1 Planning maps, including maps 13d and 26

3.1.1 Wakatipu Basin Lifestyle Precinct

The Submitter **OPPOSES** the rezoning of the Land, including their property (Lot 2 DP337565, 397 Lake Hayes Road, Arrowtown) and other land located south of the Millbrook Zone, west of the Arrowtown-Lake Hayes Road, west of the Waterfall Park Zone and north of Waterfall Park Road, to the WBRAZ.

The reasons for the opposition are:

- (a) The Land is a long-established rural living area, with several small rural living properties with residences and related buildings and activities, of a similar density to the north and east of Lake Hayes;
- (b) The Land is able to absorb additional rural living development, due to the location and topography, without adverse effects on wider landscape and visual amenity values;
- (c) The Land is adjacent to the Millbrook Zone and the Waterfall Park Zone, which enable intensive activities including residential and visitor accommodation activities;
- (d) The area is connected to reticulated services, reflecting the reasonably high intensity of urban and rural residential / lifestyle development in the area;
- (e) Given the existing character – recognised in the urban, rural living, and resort zonings as well as the Rural General zone development – the area has potential to absorb additional rural living development at a scale and form that is compatible with the existing zonings and development;
- (f) The Council's Landscape Category Unit (**LCU**) analysis (Unit 23 – Millbrook) includes much of the Land. The “Moderate” character classification includes descriptors such as “attractive urban parkland setting”. Small rural living properties not within the Millbrook Zone but within the same LCU should have a zoning that is consistent with their existing uses and the wider character of this landscape. The WBRAZ is not consistent with the LCU or the existing uses.
- (g) The WBRAZ is inefficient because it:
 - does not match or resemble the existing development that has evolved across the Land;
 - will unnecessarily frustrate legitimate and reasonable development and redevelopment of properties;
- (h) The WBRAZ is unreasonable to the extent that it removes existing development rights without providing a reasoned and justifiable basis for such removal;

- (i) Rezoning the Land to the WBLP (with modifications) is preferable because the WBLP:
- does not cause the problems inherent in rezoning the land WBRAZ, as identified above;
 - reflects the existing pattern of subdivision and land use;
 - better enables additional rural living development without adverse effects on wider landscape and visual amenity values;
 - better achieves the higher order objectives and policies of the PDP; and
 - better achieves the purpose and principles of the Act, as discussed in Part 3.6 below.

3.2 Chapter 24: Wakatipu Basin Lifestyle Precinct

The submissions below are made in relation to the Submitter's submission in 3.1 above in relation to rezoning the Land as WBLP.

The Submitter generally **SUPPORTS** the provisions set out in Chapter 24 for the WBLP but seeks the modifications set out in 3.2.1 – 3.2.9 below.

3.2.1 Part 24.1: Zone Purpose

Modify the Zone Purpose as follows:

...

In the Precinct ~~a limited opportunity for~~ subdivision is provided for, with a range of minimum lot sizes to suit the locational attributes of the particular part of the Precinct. ~~of 6000 in conjunction with an average lot size of one hectare (10,000m²)~~. Controls on the location, nature and visual effects of buildings are used to provide a flexible and design led response to the landscape character and visual amenity qualities of the Precinct.

...

The reasons for this modification are:

- (a) The words "... *limited opportunity for subdivision* ..." should be deleted because the primary purpose of the WBLP is rural residential living, and therefore the opportunity for subdivision for this purpose should be encouraged and enabled;
- (b) The minimum lot size of 6000m² and average lot size of 1ha:
- (i) does not reflect the range of development densities which have developed under, or are anticipated by, existing zonings;
 - (ii) will not enable a "*flexible and design led response* ..." as is intended by the purpose statement. Rather, the similarity in the minimum and average lots sizes would yield a standard, uniform, "cookie-cutter" subdivision outcome, across the WBLP, with lots generally between 6000m² and 1.4ha. This range may not be the best fit for the particular natural features, landscape character or amenity values of a particular area;

- (c) Across the WBLP there is a wide variety of locational attributes, topographies, and degrees of potential visibility. Some WBLP areas (including the site) are located so that new development would either be not visible or generally very discrete when viewed from public places, particularly roads, while development in others would be more visible. The most appropriate intensity in some areas may be a 6000m² minimum lot size / 1ha average, but in other areas this may not be the case; a smaller minimum and/or average lot size may be more appropriate, to achieve:
- greater flexibility and innovation in subdivision design; and
 - design that integrates lots and development with the natural features, landscape character or amenity values of a site and wider surrounds;
 - lot sizes that properly reflect existing operative zonings;
- (d) Areas within which new development is able to be absorbed into the landscape without adverse effects on the wider landscape values of the Basin – as generally delineated by the WBLP – are, collectively, a finite resource. More efficient use of these areas, for the WBLP's primary purpose of rural living development, should be enabled; the provisions should generally promote a greater intensity of rural living lots while maintaining development standards to appropriately manage external effects;
- (e) There is no clear section 32 evaluation that justifies the blanket 6000m² / 1ha regime for the whole of the WBLP.

3.2.2 Part 24.2 – Objectives

Insert a new objective and policies as follows:

24.2.2 Objective – The benefits arising from rural living activities, and existing property rights, are recognised and provided for.

24.2.2.1 *The benefits derived from rural living development in the Wakatipu Basin, including benefits to landowners, landowner's visitors, economic benefits (such as the letting of homes), and employment benefits (such as those derived from construction, landscaping, and property maintenance) are recognised and provided for.*

24.2.2.2 *Property rights existing at the time the Plan was notified are maintained and protected.*

[Renumber subsequent provisions 24.2.2 – 24.2.5 as 24.2.3 – 24.2.6 accordingly].

The reasons for the additional objective and policies are:

- (a) The legacy zonings and consents, including the provisions of and consents obtained under the Rural and Rural Living zones in the Basin, have been relied on by landowners and have generated significant positive benefits to the District;
- (b) Benefits include the employment created in the construction, landscaping and maintenance of dwellings and other structures, the well-being they create for their owners and guests, the visitor accommodation opportunities they create, and in many cases the positive environmental amenities they create;

- (c) The District Plan should also recognize and provide for the social, economic and visual amenity benefits that flow from rural living development.

3.2.3 Objective 24.2.5

Modify this objective as follows:

24.2.5 Objective – ~~The landscape character and visual amenity values of the Precinct are maintained and enhanced in conjunction with enabling rural residential living opportunities. Enable rural residential living opportunities while managing effects of subdivision and development on the landscape character and visual amenity values of the Precinct.~~

The reason for the modification is: the premise of the notified objective is flawed because the WBLP is intended to provide for rural residential living which will inevitably change the landscape character and visual amenity of a site (and, potentially, the wider surrounding area). The wording of the notified objective could be interpreted to mean that landscape character and visual amenity values should not change. In particular, “maintain” implies “do not change”, and “enhance” implies “improve”. The premise of the objective should be reversed, in that the purpose of the Precinct – having found to have capacity for absorption of development – is rural residential living, enabled in a way that effects on landscape character and visual amenity values are properly managed;

3.2.4 Policies 24.2.5.1 – 24.2.5.6

Modify the policies as follows:

- | | | |
|-----------------|-----------------|---|
| Policies | 24.2.5.1 | <i>Provide for rural residential subdivision, use and development only where it protects, maintains or enhances while taking into account and avoiding, remedying or mitigating any potential adverse effects on the landscape character and visual amenity values as described within the Landscape eCharacter uUnit as defined in Schedule 24.8.</i> |
| | 24.2.5.2 | <i>Promote design-led and innovative patterns of subdivision and development that maintain and enhance take into account the landscape character and visual amenity values of the Wakatipu Basin overall as described in Schedule 24.8.</i> |
| | 24.2.5.3 | <i>Provide for non-residential activities, including restaurants, visitor accommodation, and commercial recreation activities while ensuring these are appropriately located and of a scale and intensity that ensures that the amenity, quality and character of the Precinct is retained.</i> |
| | 24.2.5.4 | <i>Implement minimum and average lot size standards in conjunction with building coverage and height standards development standards so that the landscape character and visual amenity qualities of the Precinct as described in Schedule 24.8 are not compromised by cumulative adverse effects of development.</i> |
| | 24.2.5.5 | <i>Maintain and enhance a distinct and visible edge between the Precinct and the Zone.</i> |
| | 24.2.5.6 | <i>Retain vegetation when carrying out development where this contributes to landscape character and visual amenity values of the Precinct and is integral to the maintenance of the established character of the Precinct.</i> |

The reasons for the modifications are:

- (a) The modification to Policy 24.2.5.1 is necessary to reflect the changes to the objective, as discussed in 3.2.2 above, and for the same reason as the changes to the objective.
- (b) The modifications to Policy 24.2.5.2 are necessary for the reasons set out above in relation to the objective: subdivision and development for rural residential living purposes will inevitably change landscape character and visual amenity values. The words “maintain” and “enhance” imply, respectively, “do not change”, and “improve”, which may be interpreted to be contrary to the WBLP’s primary purpose of rural residential living. Rather, change should be anticipated and properly managed, and development should be required to take into account the specific values of the landscape character units, as recorded in Schedule 24.8;
- (c) The modifications to Policy 24.2.5.4 are necessary, as follows:
 - (i) Given the wide variety of locational attributes, topographies, and degrees of potential visibility from other areas, the “one size fits all” approach, with a minimum and average area, is not appropriate for the WBLP. Some areas may be able to absorb smaller sites, some not, and in some areas an average may be appropriate. Accordingly, the words “minimum and average” are deleted from the policy. A 4000m² minimum (or minimum average) is appropriate in some areas whereas the notified 6000m² / 1ha average could apply to some other areas;
 - (ii) “Building coverage” and “height standards” are only two of the relevant standards that play a role in regulating development for the purpose of managing effects on landscape and visual amenity values. Setbacks from roads and other properties are also relevant standards. The policy should take into account all of the relevant standards, and the modification reflects this;
 - (iii) The words “... of the Precinct ...” are deleted because landscape and visual amenity values are not constant across all areas within the Precinct; there is a wide variety of locational attributes, topographies, and degrees of potential visibility. Each area within the Precinct is addressed in the Landscape Character Unit descriptions in Schedule 24.8, and it is appropriate that these descriptions, rather than an assumed generic set of values are the subject of the Policy.
- (d) The modifications to Policy 24.2.5.6 are necessary to support a landscape plan possibly requiring retention of existing trees rather than a blanket tree protection rule regardless of effects and without assessment of the effects;

3.2.5 Part 24.4: Rules – Activities – Table 24.2

Modify Table 24.2 as follows:

Table 24.2	Activities in the Wakatipu Basin Lifestyle Precinct	Activity Status
...		
<u>24.4.25</u>	<p><u>The construction of new residential buildings and the exterior alteration to existing buildings located within an existing approved/registered building platform area.</u></p> <p><u>Control is restricted to:</u></p> <ul style="list-style-type: none"> • <u>Building scale and form.</u> 	<u>C</u>

	<ul style="list-style-type: none"> • <u>External appearance including materials and colours.</u> • <u>Accessways.</u> • <u>Servicing and site works including earthworks.</u> • <u>Retaining structures.</u> • <u>Infrastructure (e.g. water tanks).</u> • <u>Fencing and gates.</u> • <u>External lighting.</u> • <u>Landform modification, landscaping and planting (existing and proposed).</u> • <u>Natural hazards.</u> <p><u>Excludes farm buildings as provided for in Rule 24.4.8</u></p>	
24.2.26	<u>The construction of new residential buildings not located within an existing approved/registered building platform area</u>	<u>NC</u>
[renumber accordingly]	...	

The reasons for the modification are:

- (a) Where a residential building platform (**RBP**) has previously been approved, the likely effects of a future dwelling on the new lot will have been assessed. The location and effects of a future dwelling, along with other associated works such as access and landscaping, will have been sufficiently apparent, at the time of approval, to allow certainty of the right for a future dwelling and to preclude any need for Council discretion to refuse an application for a dwelling¹;
- (b) The Restricted Discretionary Activity (**RDA**) status for a dwelling within a RBP creates too much uncertainty for property owners and is unnecessary, particularly so in the WBLP because the purpose of the WBLP is to create lots for rural residential purposes;
- (c) The Controlled activity status is more appropriate because it provides certainty for landowners while still allowing the Council to manage the effects of a dwelling within the RBP, and associated works, through imposing conditions in relation to the matters of control, as set out in the rule;
- (d) The planning method of creating a RBP at the time of the discretionary activity / restricted discretionary subdivision, with controlled activity status for subsequent buildings within the RBP, is well-established in the District, and there is no evidence or section 32 evaluation suggesting that the method has generated adverse effects and is inappropriate;
- (e) The default status of non-complying is appropriate for any proposed building not located within an existing approved/registered building platform area, because it sets very clear guidance on the expected density of dwellings in the WBLP.

3.2.6 Part 24.5: Rules – Standards – Table 24.3

Modify Table 24.3 as follows:

¹ Provided other appropriate development standards are met

	Table 24.3 – Standards	Non-compliance Status
24.5.1	<p>Building coverage</p> <p>The maximum building coverage for all buildings shall be:</p> <p>For lots 4000m² or greater: 15% of lot area, or 500 1000m² gross floor area whichever is the lesser.</p> <p>For lots less than 4000m²: 25% of lot area</p>	RD
...		
24.5.3	<p>Building height</p> <p>The maximum height of any building shall be 6 8 m.</p> <p>Discretion is restricted to ...</p>	NC
...		
24.5.15	<p>Residential visitor accommodation</p> <p>The commercial letting of one residential unit or residential flat per site for up to 3 lots not exceeding a cumulative total of 28 nights per 12 month period</p>	D
<u>24.5.17</u>	<p><u>Density of dwellings in the Wakatipu Basin Lifestyle Precinct</u></p> <p><u>One dwelling per xxm² net</u></p> <p><i>[note – the net area should match the various densities from Rule 27.5.1]</i></p>	NC

The reasons for the modification are:

- (a) In relation to Rule 24.5.1:
- (i) The reference to “gross floor area” (GFA) is redundant as the rule is targeting a limit on building footprint, not GFA;
 - (ii) The maximum allowed size of a RBP is 1000m² so this should be the maximum coverage, including dwelling and accessory buildings, or 15% of lot area, for lots larger than 4000m². The effects of the location of these buildings within the RBP will have been addressed at the time of subdivision, and there is no further need to address effects of the location of the building;
 - (iii) For lots smaller than 4000m², 15% coverage may be too small to comfortably accommodate a dwelling and accessory buildings, therefore a 25% coverage limit is proposed.
- (b) In relation to Rule 24.5.3:
- (i) The building height of 6m is too restrictive and may only enable 1 – 1.5 floors in a dwelling;
 - (ii) A building height of 8m is more appropriate as it enables two levels. The 8m height limit has existed for many decades without significant problems;
- (c) In relation to Rule 24.5.15:
- (i) The rule should be deleted because it is a significant market intervention without environmental justification.

3.2.7 Rule 24.7: Assessment matters – Restricted Discretionary Activities

Modify the rule as follows:

24.7 Assessment Matters – Controlled and Restricted Discretionary Activities

24.7.1 In considering whether or not to grant consent and/or to impose conditions on a resource consent, regard shall be had to the assessment matters set out at 24.7.3 to 24.7.13.

24.7.2 All proposals for restricted discretionary activities will also be assessed as to whether they are consistent with the relevant objectives and policies for the Zone or Precinct as well as those in ~~Chapters 3-Strategic Direction; Chapter 4- Urban Development; Chapter 6-Landscapes and Chapter 28- Natural Hazards.~~

The reason for the modification to 24.7.1 is: the modification is a consequential amendment arising from the submission in 6.2.2 above, in relation to the status of dwellings within a RBP.

The reason for the modification to 24.7.2 is: it is inappropriate to require assessment of an RDA against the higher order objectives and policies of the Plan, as this opens up the discretion to practically any matter, rather than restricting it to the matters for which the rule is designed. The costs to the applicant and the Council of requiring such an assessment would be unreasonably high. The only reasonable exception is the provisions for natural hazards.

3.2.8 Rule 24.7.3 Assessment matters

Modify Rule 24.7.3 as follows:

	Assessment matters
24.7.3	<p>New buildings (and alterations of existing buildings), residential flat, building coverage and building height infringements:</p> <p>Landscape and visual amenity</p> <p>a. Whether the location, form, scale, design and finished materials including colours of the building(s) adequately responds to the identified landscape character and visual amenity qualities of the landscape character units set out in Schedule 24.8 and the criteria set out below.</p> <p>b. The extent to which the location and design of buildings and ancillary elements and the landscape treatment complement the existing landscape character and visual amenity values, including consideration of:</p> <p>...</p> <ul style="list-style-type: none"> • Design, <u>and</u> size and location of accessory buildings <p>...</p>
...	

The reason for the submission is that the location of buildings will have been addressed at the time of subdivision

3.3 Variation to Stage 1 Subdivision and Development Chapter 27

3.3.1 Rule 27.5.1

The Submitter **OPPOSES** the proposed amendments to Rule 27.5.1 and seek modifications to the rule, as follows:

Zone		Minimum Lot Area
Rural	...	
	Wakatipu Basin Lifestyle Precinct	... • <u>4000m² average</u>

The reasons for the opposition and the modification are as follows:

- (a) The reasons set out in 3.2.1 above;
- (b) The area has varied topography and features which collectively enable innovative subdivision responses that take into account:
 - the topography;
 - views;
 - neighbouring properties and their various land uses;
- (c) The rigidity of the 6000m² / 1ha average subdivision configuration, and the non-complying status for breaching these minima, would inhibit such an innovative design approach and would likely lead to an inferior environmental outcomes, for future lot owners and neighbours;
- (d) The 6000m² / 1ha average rules are contrary to the various provisions seeking flexible and innovative subdivision design, for example:
 - Policy 24.2.5.2: “Promote design-led and innovative patterns of subdivision and development ...”;
 - Assessment matters for subdivision, such as Rule 27.7.6.2(f): “Whether clustering of future buildings would offer a better solution for maintaining a sense of openness and spaciousness, or the integration of development with existing landform and vegetation patterns.”
- (e) Smaller lot sizes and average sizes would overcome these problems, and lead to more efficient use of the scarce resource of land in the Basin that is suitable for zoning for rural living.

3.4 Chapter 25 – Earthworks

The Submitter **SUPPORTS** the proposed provisions of Chapter 25 – Earthworks, insofar as they relate to the WBLP, the Rural Residential and Rural Lifestyle Zones, for the reason that the provisions adequately address the potential effects of earthworks.

3.5 Variation to higher order Chapters of the PDP

The Submitter considers that various modifications are necessary to Chapter 3 (Strategic Direction) and Chapter 6 (Landscapes) of the PDP, so that the WBRAZ and the WBLP are integrated with and have higher order authority from those chapters. This will include new objectives and policies within those chapters.

3.6 Variation to Stage 1 Landscapes – Chapter 6

3.6.1 Part 6.4 – Rules – Rule 6.4.1.3

Modify the rule as follows:

6.4.1.3 *The landscape categories assessment matters do not apply to the following within the Rural Zones:*

- a. *Ski Area Activities within the Ski Area Sub Zones.*
- b. *The area of the Frankton Arm located to the east of the Outstanding Natural Landscape line as shown on the District Plan maps.*
- c. ~~*The Gibbston Character Zone.*~~ **The Gibbston Character Zone**
- d. ~~*The Rural Lifestyle Zone.*~~ **The Rural Lifestyle Zone**
- e. ~~*The Rural Residential Zone.*~~ **The Rural Residential Zone**
- f. **The Wakatipu Basin Lifestyle Precinct**

The reasons for the submission are:

- (a) The zones that have been deleted from the exemptions for assessment under the landscape categories in Chapter 6 (Gibbston Character, Rural Lifestyle and Rural Residential) should be reinstated in the list of exemptions because:
 - these zones have already been determined to have certain landscape values and ability to absorb certain activities and development densities; and
 - the zones have their own sets of objectives, policies, rules and assessment matters, formulated for the specific attributes and circumstances of those zones. The matters of discretion and assessment matters are sufficient to properly guide the determination on specific applications;
 - there is no adequate justification for removing these zones from the exemptions.
- (b) The WBLP should be added to the list of exemptions for the same reason as in (a) above – the WBLP zones has its own set of objectives, policies, rules and assessment matters, formulated for the specific attributes and circumstances of the zone.

3.7 Part 2 and section 32 of the Act

3.7.1 Section 5

Zoning the Land as WBRAZ does not achieve the purpose of the Act in that it:

- removes land use and subdivision rights established through existing legacy zonings which does not enable the landowners directly affected to provide for their social and economic well-being as they have made and continue to make significant economic decisions based on those zonings;
- does not reflect the existing landscape characteristics of the area;
- is not necessary in respect of sustaining the potential of the natural and physical resources for future generations and safeguarding the life-supporting capacity of air, water, soil, and ecosystems;

- does not recognise or provide for the benefits which flow from rural living activities
- will not avoid or mitigate potential adverse landscape and amenity effects because the rural residential development and character already exists, having been facilitated by the long-existing zonings for that purpose and/or existing development patterns in the area.

The purpose of the Act is better achieved by rezoning the land WBLP, subject to the proposed modifications to the WBLP as sought in this submission or rezoning to the PDP's Stage 1 Rural Residential Zone.

3.7.2 Section 7

The modifications sought in this submission are directly relevant to achieving the following matters to which particular regard must be given:

- (b) *the efficient use and development of natural and physical resources;*
- (c) *the maintenance and enhancement of amenity values;*
- (f) *maintenance and enhancement of the quality of the environment;*
- (g) *any finite characteristics of natural and physical resources;*

On efficiency:

- The WBRAZ is inefficient because it will significantly impede further development of the Land which is unnecessary and inappropriate;
- The area is fully serviced by existing reticulated infrastructure and it is more efficient to retain and enhance the capacity of the area to connect with these services;
- The area fulfils a role in the rural residential market, and this should continue, in its contribution to market efficiency;
- It is inefficient for land zoning that does not match or at least complement the existing development that has evolved.

Given the extent of the existing residential and rural living development in the wider area, amenity values and the quality of the environment are just as likely to be provided for with a rural living zoning, with suitable provisions for retaining and enhancing amenity values, as would be achieved through the WBRAZ.

Suitable locations for rural living development are a finite resource in the Basin and impeding further development in an established rural residential area is unjustified, especially where there is no meaningful environmental case for such impediment.

3.7.3 Summary – Part 2 of the Act

The WBRAZ over the Submitter's property and Land as discussed in this submission does not achieve the purpose and principles of the Act.

Rezoning the land to the WBLP, with the modifications sought in this submission, and inserting a new objective and policies in relation to the benefits of rural living, will achieve the purpose and principles of the Act, for the reasons set out in this submission.

In the alternative, the Rural Residential Zone will achieve the purpose and principles of the Act, for the reasons set out in this submission.

4. The Submitters seek the following decision from the Queenstown Lakes District Council:

The Submitter seeks the relief set out in Parts 3.1 – 3.5 of this submission, including:

- 4.1 The relief set out in Parts 3.1 – 3.6 of this submission.
- 4.2 The Submitter seeks in the alternative additional or consequential relief necessary or appropriate to address the matters raised in this submission and/or the relief requested in this submission, including any such other combination of plan provisions, objectives, policies, rules and standards provided that the intent of this submission, as set out in Parts 2 and 3 of this submission, is enabled.

The Submitter **DOES** wish to be heard in support of this submission.

If others make a similar submission, the Submitter will consider presenting a joint case with them at a hearing.

Signature of Submitter



J A Brown
*Authorised to sign on behalf of
G Wills & T Burdon*

Date: 23 February 2018

Telephone: 03 409 2258

Notes to person making submission:

If you make your submission by electronic means, the email address from which you send the submission will be treated as an address for service.

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6 (4) of Schedule 1 of the Resource Management Act 1991.

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

Attachments:

Figure 1 Site Location Plan of Land to be Rezoned Wakatipu Basin Lifestyle Precinct

FIGURE 1

SITE LOCATION PLAN OF LAND TO BE REZONED WAKATIPU BASIN LIFESTYLE PRECINCT

