

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of a submission to Stage 2 of the
Proposed District Plan

BY **WILLOWRIDGE DEVELOPMENTS
LIMITED**

SYNOPSIS OF SUBMISSIONS FOR WILLOWRIDGE DEVELOPMENTS LIMITED

Dated: 12 September 2018

Solicitors:

G M Todd/B B Gresson
PO Box 124
Queenstown 9348
P 03 441 2743
F 03 441 2976
graeme@toddandwalker.com;
ben@toddandwalker.com

MAY IT PLEASE THE PANEL:**Introduction**

1. These submissions are given on behalf of Willowridge Developments Limited ("**Willowridge**") in support of its submission to Stage 2 of the Queenstown Lakes Proposed District Plan ("**Plan**").
2. Willowridge's submission seeks amendments to the provisions of the Transport Chapter of the Plan. Specifically, Willowridge seeks amendments to the provisions of the Plan relating to the proposed "High Traffic Generating Activities" and the provision for such activities to require a resource consent.

Rule 29.4.10 – High Traffic Generating Activities

3. Willowridge's submission seeks deletion or amendment of this rule as it will trigger the need for unnecessary resource consents. Developments that would otherwise be permitted and for which the effects on the environment have already been assessed at the time of rezoning and are clearly minor or less than minor, will now require consent as a controlled or discretionary activity. This is contrary to the purpose of the Resource Management Act 1991 ("**Act**") as it will result in an inefficient use of resources.
4. While the evidence of the Queenstown Lakes District Council ("**Council**") has recommended some revisions to the rule, the basis for Willowridge's opposition remains.
5. In particular Willowridge objects to the Council's recommendation that the rule apply district wide.
6. As noted in Willowridge's submission it is not sound resource management planning to require developments in different areas of the district with very different transport requirements to have to abide the same standards. Wanaka for example does not have a public transport system and yet it is proposed to be subject to the same rule as Queenstown, where there is a clear intention by the Council to encourage more public transport use and place less reliance on private vehicles.
7. Further, there is no section 32 analysis that justifies the proposed transport provisions applying on a district wide basis.
8. In response to this submission Ms Jones for the Council considers "it appropriate that the HTGA rule should apply district-wide and not only to areas where there is already a clear need to reduce the number of private vehicles". She does not address why in fact the rule should apply district wide.
9. For this reason Willowridge maintains its submission that the transport rules should not apply district wide.

10. The evidence of the Council does also not address the fact that the rule will result in developers having to contribute to the Council's transport requirements in addition to the existing contributions they make by way of development contributions and rates. Again this is contrary to the purpose of the Act as it not a sustainable use of economic resources, will place undue requirements on developers, and will dis-incentivise development.

Table 29.10 – Thresholds for High Traffic Generating Activities

11. Willowridge submits the thresholds in Table 29.10 are inappropriate largely for the same reasons as why Rule 29.4.10 should be deleted or amended. They will create the need for expert transport assessments in situations where such assessments are not necessary nor helpful.

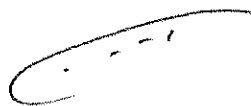
12. Again this is an inefficient use of resources and contrary to the purpose of the Act.

13. It is also submitted the thresholds in Table 29.10 are subjective and too low. To require for example a development of 50 residential units to be subject to a resource consent on the basis of Rule 29.4.10 is totally inefficient and will in many cases simply result in developers choosing to apply for a lesser number of units.

Conclusion

14. It is submitted the proposed transport rules as set out above will not result in efficient or sustainable use of resources and will therefore be contrary to the purpose of the Act.

15. For these reasons it is submitted the rules be deleted or amended as per the relief sought in Willowridge's submission.



G M Todd/B B Gresson
Counsel for Willowridge Developments Limited