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 Hearing Stream 12 – Upper Clutha Mapping Annotations and Rezoning Requests

REPLY OF VICKI JONES ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL

UPPER CLUTHA

10 July 2017



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1. INTRODUCTION

- 1.1 My name is Victoria (Vicki) Sian Jones. I adopted the section 42A report for Hearing Stream 12 prepared by Ms Amy Bowbyes entitled 'Group 1B Wanaka Business' and prepared rebuttal evidence in relation to the Group 1B Wanaka Business submissions.
- **1.2** My qualifications and experience are set out in my rebuttal evidence dated 5 May 2017.
- 1.3 I have reviewed the evidence filed by other expert witnesses on behalf of submitters, attended part of the hearing (specifically on 17 May and 30 May) and have been provided with information from submitters and counsel at the hearing, including reports and recordings of what has taken place at the hearing each day that relate to my evidence and recommendations.
- **1.4** This reply evidence covers the following issues:
 - (a) any existing small centres that broadly reflect what is envisaged for the Cardona Valley Road;
 - (b) Wanaka Lakes Health Centre Site scope and bespoke rules;
 - (c) the size and shape of the Local Shopping Centre Zone
 (LSCZ) at Cardrona Valley Road;
 - (d) whether the purpose of the LSCZ is also to cater for tourist traffic (as submitted by the Gordon Family Trust);
 - (e) relevant PDP objectives, policies and provisions in relation to the edge of towns and the Three Parks Zone;
 - (f) the bulk and location of buildings at the boundary between the Medium Density Residential Zone (MDR) and the Town Centre Transition Overlay area, under both the proposed rules and those promoted on behalf of Varina;
 - (g) carparking and access under both the Medium Density Residential (Town Centre Transition Overlay) Zone (MDR-TCTO) and the Wanaka Town Centre Transition Overlay Zone (WTC(TO)) scenarios;
 - (h) noise limits proposed by Mr Greaves for the **WTC(TO)**; and

- (i) capacity in the MDR Zone and the Wanaka Town Centre Zone.
- 1.5 All references to the Proposed District Plan (PDP) provision numbers are to the Council's Reply version of those provisions, unless otherwise stated. In addition, I have used tab references to documents included in the Council's Bundle of Documents (CB) dated 10 March 2017, the Supplementary Bundle of Documents (SB) dated 17 March 2017, and the Second Supplementary Bundle of Documents (SSB) dated 24 May 2017.

2. GORDON FAMILY TRUST (395/1193)

Existing small centres that broadly reflect what is envisaged for the Cardona Valley Road

- 2.1 I was asked by the Panel to provide some additional information, and this was largely provided via a memorandum of counsel dated 6 June 2017. In addition, the Panel requested that I identify, in the Council's reply, existing small centres within the District that broadly provide for the sort of outcome envisaged for the LSCZ at Cardona Valley Road.
- 2.2 Having considered this question in some detail, I have come to the conclusion that none of the <u>existing</u> small centres within the District provide a sufficiently accurate comparison to be of any meaningful assistance to the Panel.
- 2.3 For instance, while the established operative Frankton Corner Shopping Centre Zone has some similarities to what could be expected to occur at Cardrona Valley Road in terms of the intensity and scale of development and the types of uses within it, its location directly adjacent to one of the busiest intersection in the District and within close proximity to various other commercial areas and a central bus terminal means it functions, and will increasingly function, in quite a different way to the LSCZ on Cardrona Valley Road.
- **2.4** Other examples such as the Corner Shopping Centre Zone at Fernhill are not comparable as they are much smaller than what is

recommended at Cardrona Valley Road, comprising only 2 to 3 shops, and are not located on busy arterial roads with passing traffic that is unrelated to the local environment.

2.5 While the LSCZ at Albert Town is not an 'existing small centre' but, rather, is a largely undeveloped zoned area at this point in time, the area, shape and positioning of the LSCZ Albert Town on an arterial road make it similar to the LSCZ proposed on the Cardrona Valley Road. This zoned area is shown in **Figure 1** below,



Figure 1 - The Proposed LSCZ at Albert Town

The size of the LSCZ at Cardrona Valley Road

- **2.6** I wish to respond to a number of discrete matters raised by Mr Polkinghorne, who presented evidence on behalf of Trustees of the Gordon Family Trust (395/1193). In so doing, I also rely on the primary, rebuttal and reply evidence filed on behalf of the Council by Mr Heath.
- 2.7 I have considered the answers Mr Polkinghorne provided to the Panel's questions in relation to the most appropriate size of the LSCZ on Cardrona Valley Road and the risks, if any, associated with making it too big. I have also investigated the progress that has been made in respect of RM170094 in relation to a subdivision that, if

approved and implemented, would result in a new arterial road being built along the northern edge (and within) the proposed LCSZ.

- 2.8 The hearing for that resource consent application was on 20 June 2017 and was granted on 5 July 2017. The approved scheme plan is attached as Appendix 1.
- **2.9** Having considered all of this material, I have concluded that:
 - (a) while Mr Heath's calculations did not include the necessary land space for a service station, there is adequate capacity within the recommended 1 ha area of zoned land to enable such a service station if desired by the market;
 - (b) if resource consent RM170094 is approved and is not appealed, and the road is constructed in accordance with that resource consent, then the area of developable LCSZ land would be reduced by 3,000m²; and
 - (c) there is an existing sewer main located within the proposed road corridor. This is protected by an easement that would place some restrictions on development within this area, regardless of whether the road eventuates. The location of this easement/sewer main is shown on the attached scheme plan at **Appendix 1** as a dashed pathway within the approved Road 1.
- **2.10** I have considered the various zoning options to cater for the potential road and have assessed the costs and benefits of each as follows:

| Zoning Option | Costs | Benefits |
|------------------------|-------------------------|---------------------------|
| 1. Zone the roading | If the road is not | If the road is not |
| corridor as LDR and | constructed then the | constructed, this zoning |
| relocate the 1 ha area | strip of land would be | avoids the LSCZ |
| of LSCZ to sit wholly | developed for | becoming larger than is |
| outside the roading | residential purposes, | considered appropriate |
| corridor. | which would segregate | for its purpose, which is |
| | the medical centre and | supported through Mr |
| | LSCZ, and very likely | Heath's expert |
| | prevent any opportunity | evidence. |

| | for connectivity between | |
|------------------------------------|-----------------------------|------------------------|
| | the two complimentary | |
| | areas. | |
| | | |
| | A strip of residential | |
| | housing between two | |
| | areas of primarily non- | |
| | residential activity is not | |
| | the most appropriate | |
| | land use. | |
| 2. Retain the LSCZ | If the road is not | Avoids the risk that |
| zoning over the road | constructed, the LSCZ | connectivity between |
| corridor and increase | will be larger than is | the medical centre and |
| the area by 3,000m ² to | considered appropriate | LSCZ will be prevented |
| allow for the likelihood | for its purpose. | by private residential |
| of this road being | | development. |
| constructed. | | |
| 3. Show that part of the | There is no scope in the | |
| roading corridor that | submissions for this | |
| abuts the LSCZ as | option (i.e., for the land | |
| unformed road in the | to be void of any zone). | |
| PDP maps (i.e. which, | | |
| at this stage of the | | |
| review process, would | | |
| be no zoning). | | |

- 2.11 In conclusion, based on the costs and benefits outlined above and in the attached S32AA evaluation, I recommend increasing the size of the LSCZ at Cardrona Valley Road by 2,500m² to make allowance for the road but not increasing it by the full 3,000m² area that may be consumed by the road, as Mr Heath's land calculations already include a component for roading and access. This will result in a LSZC area of 1.25 ha including the land for the roading corridor.
- **2.12** The main reasons for changing my position on this matter since my rebuttal evidence is that:

- Resource consent RM170094 has now been approved and therefore it is more likely it will eventuate;
- (b) I had not fully appreciated that a service station was not included in Mr Heath's calculations and I consider this to be a realistic proposition given the location of the zone; and
- (c) In the event that the road approved by RM170094 is not constructed, then I consider that the adverse effects from losing the opportunity to connect the medical centre and the LSCZ (which would likely occur if the corridor is zoned residential) are greater than the adverse effects of slightly over-supply commercially zoned land in this location (by 2,500m²).
- 2.13 While this additional land would be unnecessary to achieve the LSCZ objectives or to meet demand for local shops and services in this location if it is not utilised for roading purposes, it has the benefit of ensuring that if the road is constructed, then the 1ha of LSCZ land that is considered to be appropriate will be maintained and avoids the risk of the medical centre site and the LSCZ being separated by a strip of residential development. It also acknowledges that if a service station does locate here then that will consume the 3000m² of zoned excess land that was built into the zoning supported in Ms Bowbyes' S42A report.

The shape of the LSCZ

2.14 In its Minute concerning the content of the Council's reply dated 20 June 2017 (**Reply Minute**) the Panel asked the following question:

Can Council please provide with its reply its analysis of alternative options for the shape of the Cardrona Valley Road LSCZ if its size is reduced as recommended. Please provide those in the form of an overlay on an aerial photo, with the proposed road currently the subject of a resource consent application also shown.

2.15 In response, I have attached alternative options for the shape of the Cardrona Valley Road LSCZ as **Appendix 2** to this evidence.

- **2.16** In my opinion, Option 3 (a relatively regular square shape) is the most appropriate shape for the zone for the following reasons:
 - (a) it avoids a long line of built form in either direction that would result from either of the linear strip options. Linear Option 5 would result in adverse visual effects on residents to the south and linear Option 4 would result in the zone directly abutting the existing residences to the south, and therefore revive the amenity concerns that Stuart and Melanie Pinfold and Satomi Enterprises Limited (622) and JA Ledgerwood (507) raise in their submissions;
 - (b) it minimises the sprawl of buildings along the Cardrona Valley Road;
 - (c) it provides the greatest flexibility in terms of design options;
 - (d) it encourages a design whereby the buildings line the two busy street frontages and parking and pedestrian space is internal to the site;
 - (e) it encourages a more broken built form and enables more shared parking and the opportunity for a shared amenity space;
 - (f) it provides greater accessibility to the residents to the east (than would a strip along the Cardrona Valley Road) and provides efficiently for both locals and those in transit, provided the road approved by RM170094 is constructed; and
 - (g) it provides greater connectivity to the medical centre site, regardless of whether the road approved by RM170094 is constructed.
- 2.17 An amended planning map is attached as **Appendix 3** showing a larger square shaped zone than that which was recommended in Ms Bowbyes' S42A report.

Tourist Traffic

2.18 In the Reply Minute the Panel asked the following question:

What is the Council's response to the evidence and submissions for Gordon Trust that the purpose of the LSCZ is to cater, among other things, for tourist traffic? What are the implications for Mr Heath's evidence on the desired size of the Cardrona Valley Road LSCZ if that purpose were taken into account. If the Council's view is that no need to factor in tourist traffic, please advise the Council's view as to whether that position is consistent with the role of the LSCZ at Frankton Corner.

- 2.19 In response, the purpose of the LSCZ is to cater for both locals and people in transit. Furthermore, I note that Objective 15.2.1 gives statutory effect to this purpose statement by clarifying that the LSCZ is for a range of relatively small scale activities that meet the daily needs of the community (which could include tourists, in my view) and which supplement the Town Centre. Read collectively, my interpretation of this is that the LSCZ is for people in transit as well as the local catchment but that the nature of the activities that will service these people is limited to those that provide for their daily needs and are of type that does not compete with the Town Centre.
- **2.20** I refer to paragraph 3 of Mr Heath's reply evidence where he confirms that a proportion of tourist spending is included in his retail model and analysis. I note that the only exception is that he did not initially include the potential for a service station to locate here, but I note that this could be accommodated within the 1 ha zoned area, along with the other uses he includes in his analysis. As such, there are no implications for Mr Heath's evidence in relation to the desired size of the LSCZ at Cardrona Valley Road as he has already included a proportion of tourist spending in his land demand calculations. In my view, Mr Heath's analysis is consistent with the purpose of the LSCZ and Objective 15.2.1.

3. WANAKA LAKES HEALTH CENTRE SITE (253) AND ASPIRING LIFESTYLE RETIREMENT VILLAGE (HOSPITAL) (709) – SCOPE AND BESPOKE RULES

3.1 The Health Centre submission (253) specifically seeks that the LSCZ applies to their site, and '*perhaps to the hospital site to the north*'. The submission by Aspiring Lifestyle Retirement Village (Hospital)

(709) generally sought that a 'more appropriate zone' should be applied to the land. Both areas of land were notified in the PDP as Large Lot Residential Zone (**LLRZ**).

- **3.2** I wish to respond to questions that the Panel raised with Mr White, when he appeared for Wanaka Lakes Health Centre, regarding scope and the possible inclusion of bespoke rules in the LLRZ. The possible bespoke rules would relate only to the land covered by these two submissions.
- 3.3 In my opinion there would be scope to retain the LLRZ over the subject sites and to add site specific rules that are more enabling of alterations and additions to existing community activities. This is because scope exists to zone the land to anything between the notified LLRZ and the LSCZ sought by Wanaka Lakes Health Centre and, in respect of the Aspiring Lifestyle Retirement Village (Hospital) land, anything between the notified LLRZ and 'a more appropriate zone' as sought in its submission. That said, the relief sought by Aspiring Lifestyle Retirement Village (Hospital) (709) is arguably unreasonably uncertain. Nevertheless, I consider that the Health Centre submission (which also refers to the hospital site to the north) provides scope for this site to be considered in the same manner.
- **3.4** In terms of the merits of this approach, while this would be more efficient for an owner/ developer wishing to make minor alterations or additions to existing facilities, in order to be effective in my view the rules that enable minor scale alterations and additions would need to be well defined. In addition, a site-specific policy would need to be added under Objective 7.2.6 that recognises the minor effects that are anticipated from such alterations. In my experience the drafting and administration of such rules is particularly difficult (having dealt with these types of rules in relation to alterations to heritage buildings) and I do not consider are justified in this instance.
- **3.5** I also have concerns about the efficiency of including such site specific provisions in the PDP and the ability to justify why specific rules are appropriate for this site but not for other residentially zoned sites which contain existing community facilities.

- **3.6** On balance, while I can see some merit in such bespoke provisions, in my opinion the notified LLRZ zoning and recommended revised provisions pertaining to that zone will be effective and efficient at enabling the continued use and limited expansion and alterations to the subject sites.
- **3.7** In addition and for similar reasons, I do not support applying the LSCZ to the subject sites and adding bespoke rules limiting the type of commercial uses and the coverage in an effort to provide greater certainty over the nature and scale of uses. I also note that there is insufficient traffic evidence relating to the effects of enabling an increase in the scale of community and commercial activity on these sites.

4. RESPONSE TO PANEL QUESTIONS OF VARINA PROPRIETY LIMITED (591) WITNESSES

4.1 Varina Propriety Ltd (591) seeks that the MDR-TCTO Zone is removed and the land is rezoned as WTC(TO).

Relevant PDP Objectives, Policies and Provisions in relation to the edge of towns and the Three Parks Zone

- **4.2** The Panel asked Mr Greaves, appearing on behalf of Varina Propriety Limited, what the Strategic Directions chapter says about the Three Parks Zone. To assist the Panel I also provide a response to this question below.
- **4.3** In relation to the Three Parks Zone, the Strategic Directions chapter includes the following objective and policy **[CB3]**:

3.2.1.3 Objective – The key function of the commercial core of the Three Parks Special Zone is sustained and enhanced, with a focus on large format retail development.

Policies

3.2.1.3.1 Provide a planning framework for the Commercial Core of the Three Parks Special Zone to enable large format retail development.

- **4.4** Furthermore, as mentioned by Mr Greaves, the Three Parks Zone framework of the Operative District Plan (**ODP**) seeks to protect the Wanaka Town Centre and ensure that Three Parks is complimentary to the Town Centre.
- **4.5** While Mr Greaves is correct that the focus of the Three Parks Zone is to be on large format retail that cannot be located within or is otherwise unsuitable for the Wanaka Town Centre, I note that the Three Parks Zone permits a small number of small format commercial tenants in the first stage in order to create a quality built environment (ODP Rule 12.26.7.2(6)). In my opinion, as the Council planner responsible for drafting the Three Parks Zone (in my capacity as a consultant), this small number of tenants will not have an adverse effect on the Wanaka Town Centre.
- **4.6** In response to the Panel's questioning as to any provisions in the PDP (or ODP) that direct how the edges of the Towns or zones should be managed, (to which Mr Greaves replied that he was not aware of any), I suggest that the following PDP objectives and policies are relevant **[CB8]** and **[CB13]**:

8.2.3 Objective - Development provides high quality living environments for residents and maintains provides reasonable protection of the amenity of adjoining sites taking into account the planned medium density character of the area.

Policies

8.2.3.1 Apply recession plane, building height, yard setbacks and site coverage, and window sill height controls as the primary means of ensuring reasonable protection of neighbours' access to sunlight, privacy and amenity values.

8.2.3.2 Ensure built form achieves an acceptable level of privacy for the subject site and neighbouring residential units through the application of setbacks, offsetting of habitable room windows, screening or other means.

8.2.3.3 Ensure building heights along the western side of Designation 270 do not prevent access to views from the formed walkway to the west toward Lake Wanaka and beyond.

8.2.3.4 Ensure developments of increased density take into account the amenity of existing developments on adjoining sites acknowledging the anticipated future amenity and character of the zone.

13.2.2 Objective – Wanaka is a compact, convenient and attractive town centre that has opportunities for controlled expansion and intensification.

Policies

13.2.2.1 Provide for future controlled growth opportunities through the Town Centre Transition Overlay, which enables appropriate town centre activities to establish in a discrete area of residential-zoned land adjoining the town centre, recognises the existing mixed use character of that area, and makes a clear distinction between that transition area and the adjacent residential zone.

13.2.2.2 Discourage outward expansion of town centre activities in areas other than the Town Centre Transition Overlay in order to ensure that the town centre maintains a compact form

13.2.5 Objective – Appropriate limits are placed on town centre activities to minimise adverse environmental effects received both within and beyond the town centre.

13.2.5.8 Minimise conflicts between the Town Centre and the adjacent residential zone by avoiding high levels of night time noise being generated on the periphery of the Town Centre.

4.7 While the following urban development objectives and policies relate to the edge of the urban area as a whole rather than the edge of the Town Centre Zone, the Panel may still find them helpful **[CB4]**:

4.2.2 Objective - Urban Growth Boundaries are established as a tool to manage the growth of major centres within distinct and defendable urban edges.

Policies

4.2.2.4 Not all land within Urban Growth Boundaries will be suitable for urban development or intensification, such as (but not limited to) land with ecological, heritage or landscape significance; or land subject to natural. The form and location of urban development shall take account of site specific features or constraints to protect public health and safety

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

Policies

4.2.8.1 Limit the spatial growth of Wanaka so that:

- . . .
- A distinction between urban and rural areas is maintained to protect the quality and character of the environment and visual amenity.

4.2.8.2 Ensure that development within the Wanaka Urban Growth Boundary:

...

 Provides a sensitive transition to rural land at the edge of the Urban Growth Boundaries through the use of: appropriate zoning and density controls; setbacks to maintain amenity and open space; and design standards that limit the visual prominence of buildings.

The Bulk and Location of Buildings within the TCTO at the boundary of the MDR Zone

4.8 The Panel asked Mr Greaves what the permitted building height would be under his proposed WTC(TO) provisions at the 5m internal setback. In his further evidence dated 9 June 2107, Mr Greaves

confirmed that the maximum building height at this point would be 6.37m. I agree with this calculation.

- **4.9** By way of comparison and to further assist the Panel, I can confirm that under the MDR-TCTO Zone provisions proposed in the PDP, the maximum height of a building 5m from this boundary would be 6.0m, although the building itself could be built as close as 1.5m from the boundary albeit could only be 3.5m high at that point.
- **4.10** While Mr Greaves is correct that the effect of the additional height allowed under the WTC(TO) Zone provisions that he promotes are likely to be marginal, when coupled with the absence of any site coverage rule and any minimum side yard setback rule, the effect on views is likely to be considerably greater and indeed, greater than I initially appreciated when drafting my rebuttal evidence.

Carparking and access under the MDR-TCTO Zone and WTC(TO) Zone

- **4.11** The Panel questioned Mr Greaves and Mr Carr (also on behalf of Varina Propriety Limited) in relation to:
 - (a) the absence of any specific requirement to provide for onsite parking under the Wanaka Town Centre Zone;
 - (b) the influence that the enabling policies (presumably referring to PDP Policies 13.2.6.1, 13.2.6.4 [CB11] and Policy (iv) as outlined on page 2 of Mr Greaves' further evidence) would have on the Council's ability to require such parking to be provided;
 - (c) whether providing such parking collectively off-site would incur a cost to Council;
 - (d) whether this should this be in the s32AA analysis; and
 - (e) how the Council could recover the cost.
- **4.12** In response to these questions, I consider that the enabling policies that apply to all parts of the Wanaka Town Centre Zone and the one promoted to apply specifically to the WTC(TO) Zone would limit the Council's ability to *require* parking pursuant to Mr Greaves' restricted discretionary rule. This is because, collectively, the policies establish

a framework that discourages onsite/ off street parking within the Town Centre except potentially at the periphery (which this would be).

4.13 In addition, the provision of additional off street parking to cater for the inclusion of this land to the Wanaka Town Centre Zone would incur a cost on Council. Whereas Mr Greaves suggested that one method would be through collecting development contributions under Council's Development Contributions Policy (DC Policy), this is not entirely correct. While the DC Policy 2016-17¹ does include a transport contribution this is specifically for roading improvements. The DC Policy does not enable a development contribution to be levied for the purpose of providing public car parking and would need to be amended through special consultative procedures to enable Furthermore, the Council's Revenue and Financing Policy² this. confirms that car parking is fully funded from user fees and that no rates are levied anywhere in the District for this activity. The Policy does not distinguish between commercial rates in the Wanaka Town Centre and commercial rates charged elsewhere and, as such, does not provide a source of revenue to assist with the provision of public off-site parking.

Noise Limits proposed by Mr Greaves for the WTC(TO)) Zone

- **4.14** In response to the Panel's questioning of Mr Greaves as to whether the noise limits he had proposed are reasonable, I note that in his further evidence dated 9 June 2017, Mr Greaves has amended the rule such that any activity within the WTC(TO) Zone would need to comply with the MDR noise limits at the residential boundary or at the boundary of any established residential unit located within the zone.
- 4.15 If the Panel favour applying a WTC(TO) Zone over this transition area then I support the intent of Mr Greaves rule in relation to the MDR noise limit having to meet at the zone/ overlay boundary. However, I do not agree with his proposed rules requiring the limits to also be met on the boundary of established residential properties within the

^{1 &}lt;u>http://www.qldc.govt.nz/assets/Uploads/Council-Documents/Policies/Finance/Development-Contributions/QLDC-DC-Policy-2016-Adopted.pdf</u>

² Refer pages 73-92: <u>http://www.qldc.govt.nz/assets/Uploads/Council-Documents/Ten-Year-Plans/2015-2025-10YP-VOL2.pdf</u>

overlay. While such a rule would achieve his proposed overlay specific policy (ii), it would be contradictory to Objectives 13.2.1 and 13.2.5 and Policies 13.2.1.2, 13.2.1.3, 13.2.6.8, and 13.2.5.9 **[CB11]**, which collectively recognise the important contribution of night time activities to the Town Centre and that while residential and visitor accommodation uses in the Town Centre will have a lower level of residential amenity than elsewhere and be required to insulate, residential use in the adjoining residential zones will be protected.

4.16 I consider that the approach proposed by Mr Greaves is contrary to the Wanaka Town Centre objectives and I do not support it. Furthermore, I believe the rule will be complicated to administer on an ongoing basis as land uses within the area change, and may well stifle transition and redevelopment within the area. As stated in my rebuttal evidence (paragraphs 7.15-7.16), this is one of a number of reasons why I prefer the MDR-TCTO Zone. I note that if the Panel do wish to change the zoning to WTC(TO) then rather than create an entirely new rule, the PDP Noise Rule (13.5.10) should be modified to exempt the WTC(TO) Zone from Rules 13.5.10.3, 13.5.10.4, and 13.5.10.5 [CB11]. This would mean that only Rules 13.5.10.1 and 13.5.10.2 would apply, which already require that the noise limits of any other zone need to be met at the boundary. This is consistent with the approach that has been taken to managing noise from sites on the eastern side of Ardmore Street.

Urban design matters

4.17 Ms Corson presented evidence at the hearing for Varina Propriety Ltd where she responds to Mr Garth Falconer's evidence. I have liaised with Mr Falconer who has confirmed that he does not consider that Ms Corson has raised any new matters. Therefore I do not provide any further response to her evidence.

Capacity in the MDR and Wanaka Town Centre

4.18 Ms Corson stated that there is ample MDR zoned land. In support of my opinion expressed in rebuttal evidence that medium density residential land is a scarce resource, I refer the Panel to the evidence

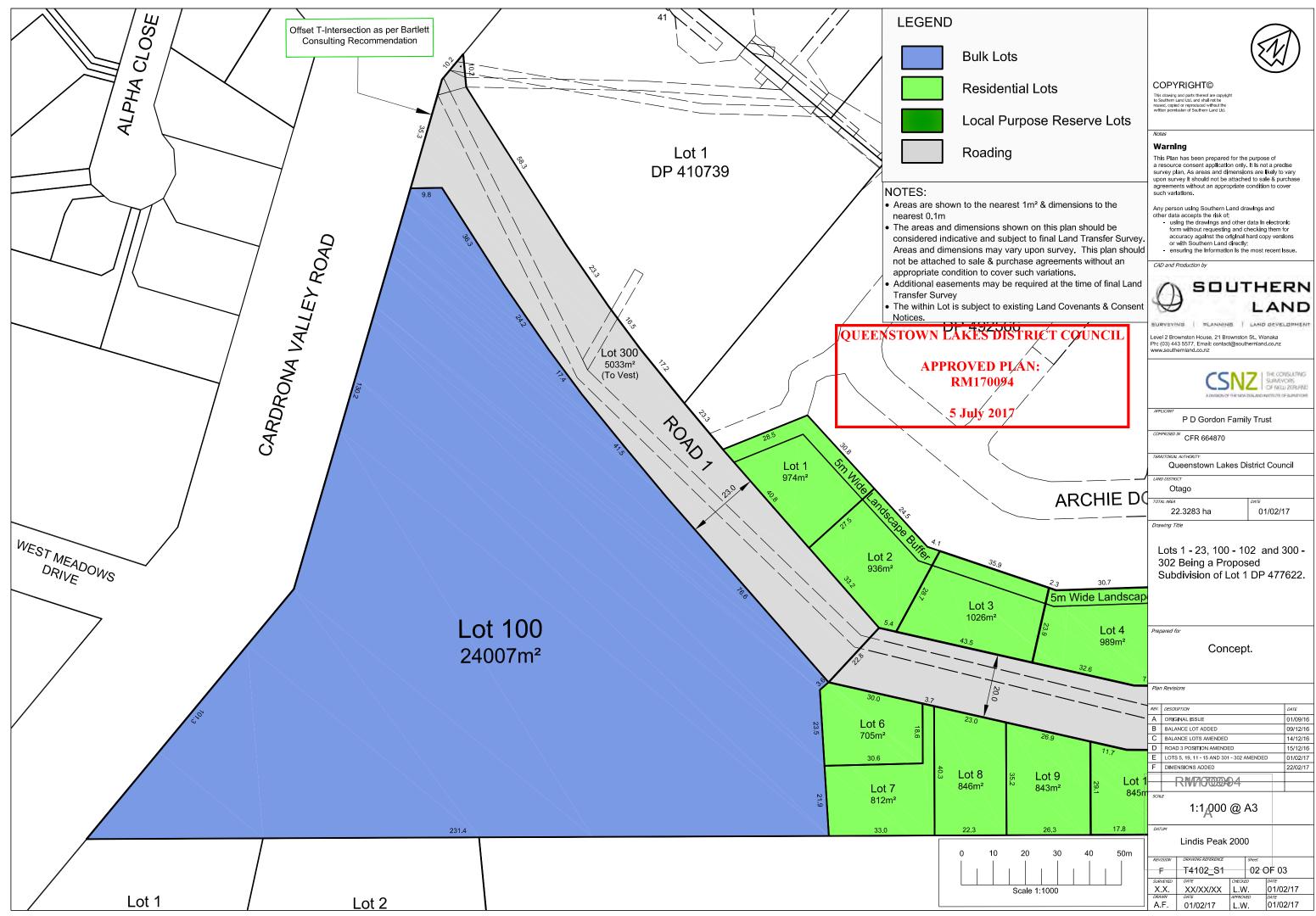
of Mr Philip Osborne in relation to dwelling capacity dated 1 May 2017. Paragraph 7.9 and Table 3of that evidence state that the enabled capacity for medium density housing is relatively low (less than 9% of the total dwelling capacity) and provides for less than 7% of all realisable capacity.

4.19 In my opinion, retaining a zoning over the subject land that provides for medium density residential development (at ground level and not just on upper floors as in the Wanaka Town Centre Zone) is hugely important to the sustainability of Wanaka in that it provides housing within walking distance of key amenities and facilities and contributes to housing choice in terms of typology and affordability.

Vicki Jones 10 July 2017

APPENDIX 1

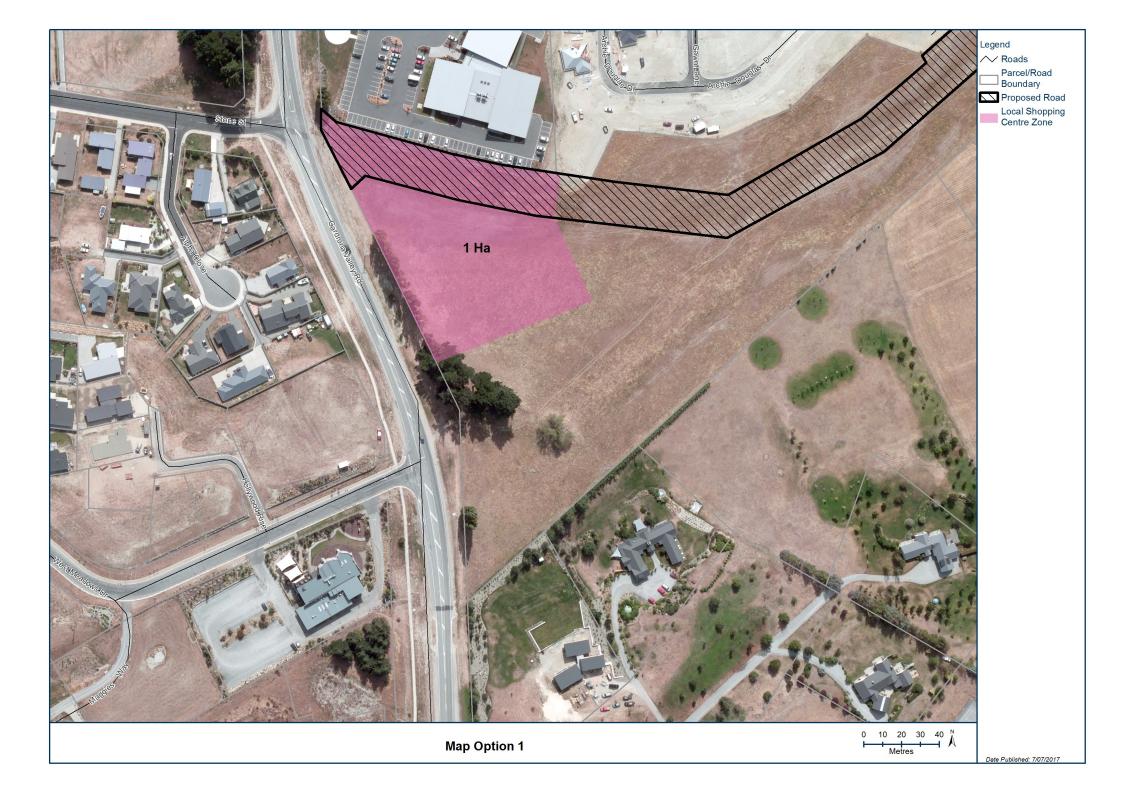
APPROVED SCHEME PLAN FOR RM170094

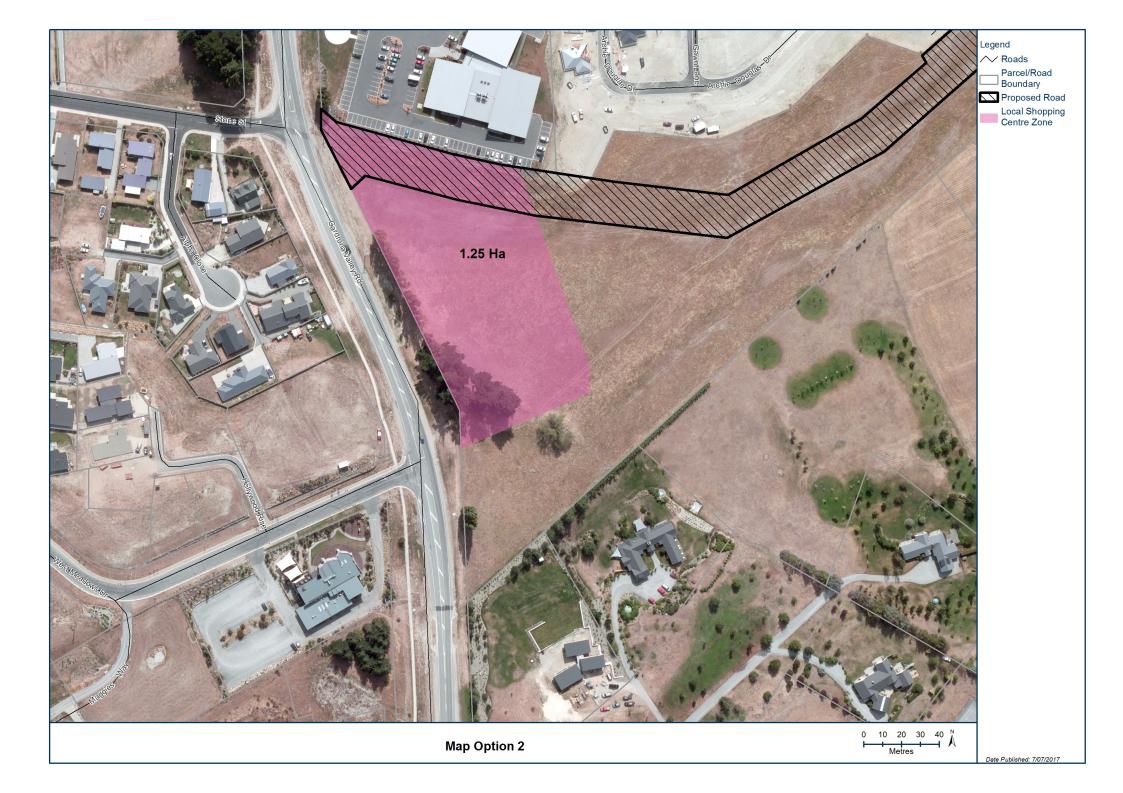


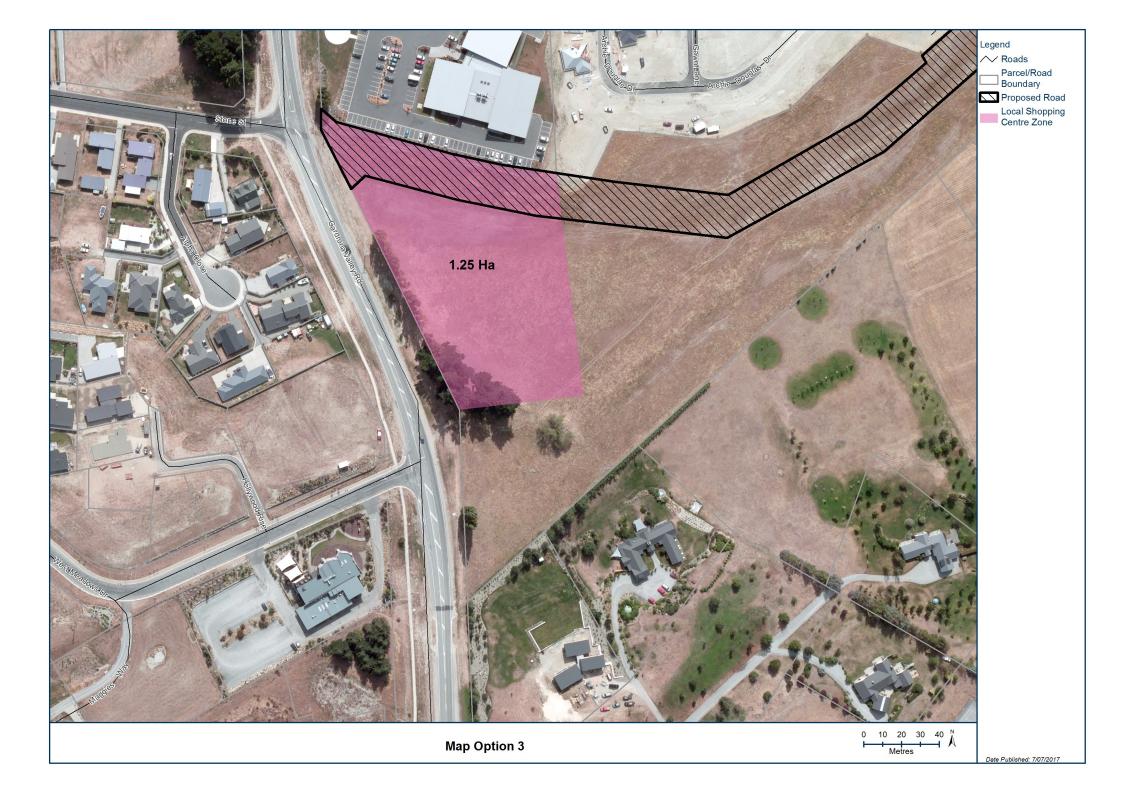
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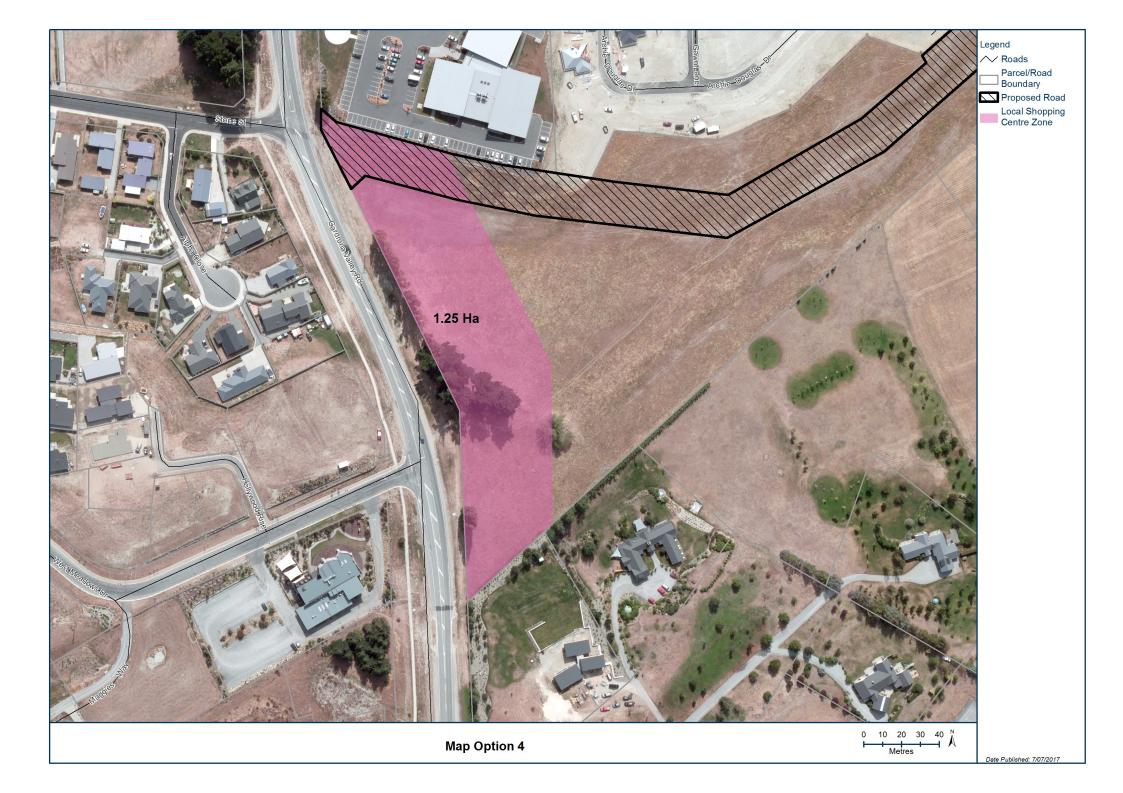
APPENDIX 2

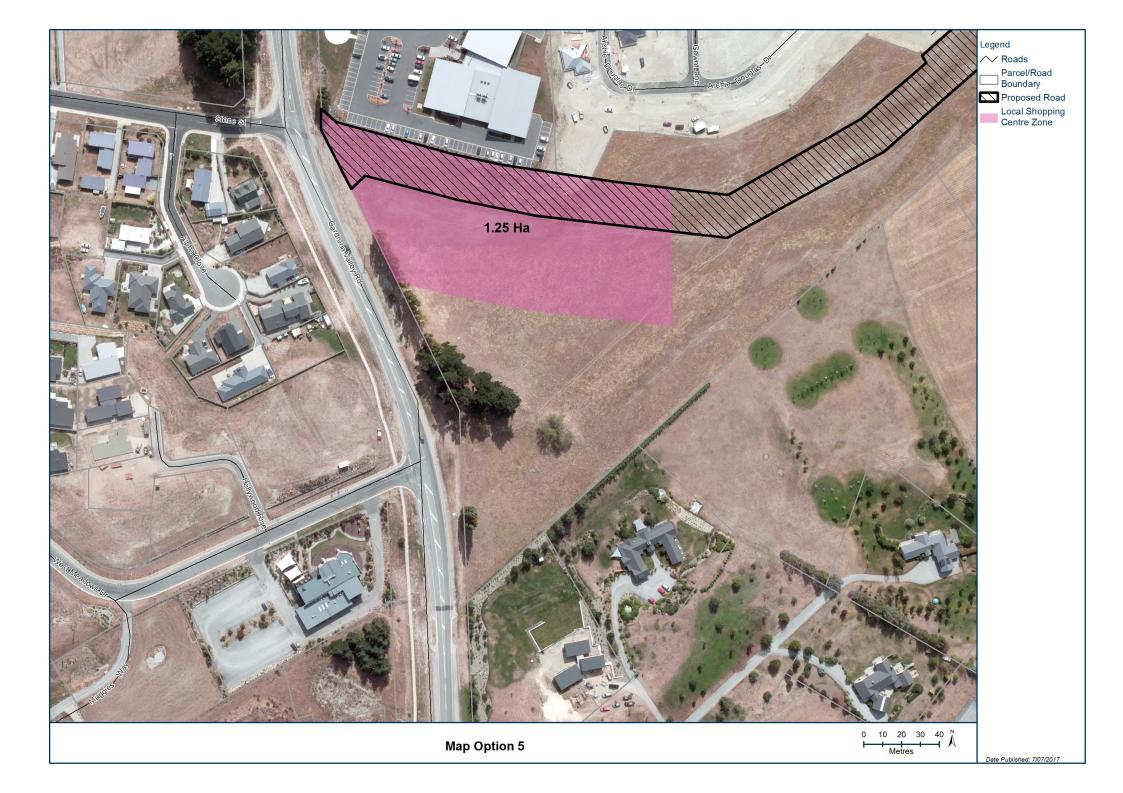
ALTERNATIVE OPTIONS FOR THE SHAPE OF THE CARDRONA VALLEY ROAD LSCZ











APPENDIX 3

MAP SHOWING RECOMMENDED SHAPE FOR CARDRONA VALLEY ROAD LSCZ

