

## Submission on the Queenstown Lakes Proposed District Plan – Stage 2

**To: Queenstown Lakes District Council**

**Details of Submitter:**

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This is a submission on the Queenstown Lakes Proposed District Plan – Stage 2 (“**Plan**”).

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

**The specific provisions that this submission relates to are:**

1. The timing of notification of the Signs, Earthworks, and Transport Chapters.
2. Rule 29.4.10 - High Traffic Generating Activities.
3. Table 29.10 - Thresholds for High Traffic Generating Activities.

**The submission is:**

4. The submitter opposes the timing of notification of the Signs, Transport and Earthworks Chapters:
  - a. These chapters apply district wide, but have been notified prior to the notification of many zone-specific provisions, such as the Three Parks Zone or Industrial Zone, which will not be notified until Stages 3 or 4 of the Plan. Submitters are not able to be fully informed as to the consequences of these district wide provisions at the time they submit as they have not been made aware of the proposed provisions of the particular zones and the relationship of such with the district wide provisions.
  - b. As a consequence, many submitters will have to submit on the same provisions at least twice; namely at the time of the notification of the district wide submissions, and at the time of notification of the zones that are not part of Stage 2.
  - c. The effect of this is we could have different district wide rules relating to different zones.
5. The submitter opposes Rule 29.4.10:
  - a. This rule will make activities otherwise permitted or controlled activities become discretionary activities if the threshold for high traffic generating activity is met. By

way of example, the use of existing buildings for commercial use in the Business Mixed Use Zone, currently a permitted activity, could become a discretionary activity under Rule 29.4.10. This will increase the number of resource consent applications that need to be made and cause unnecessary cost, delay and ultimately uncertainty as to whether consent will be able to be obtained.

- b. The effects of traffic on the roading network for permitted activities had already been assessed at the time land was zoned for such activities. To require a further assessment as part of a resource consent application for such activities is a waste of resources and will simply add cost and result in delays and uncertainty.
  - c. As the rule applies district-wide, it does not take into account the differences between areas of the district where the Plan has clearly identified the need to provide for alternatives to private vehicles (such as Queenstown) and other areas, such as Wanaka, where such need is not as urgent and public transport options are more limited.
  - d. The imposition of the rule on a district wide basis is not supported by any section 32 analysis which indicates the same is justified on a district wide basis.
  - e. Developers already contribute significantly to the district's transport requirements by way of development contributions and Council rates. Further, in terms of subdivisions, the applicant often constructs the roads forming part of the subdivision at its own cost, and then vests the roads in Council. To require applicants to go to further cost in terms of meeting the requirements imposed by this rule would be unfairly excessive and would de-incentivise development.
  - f. The transport assessments and the engaging of the relevant experts that would be required by such rule would also add unnecessary complexity, time, cost and uncertainty to the resource consent process.
  - g. The regulating and provision of public transport is a matter for Regional Councils and not District Councils.
6. The submitter opposes Table 29.10:
- a. The thresholds in Table 10 are too low in triggering Rule 29.4.10. They will lead to a number of applications for developments that are just within each threshold, for example applications to build 49 residential units (29.10.1). They will also create uncertainty, delays and additional cost as expert transport assessments will be required.

**The submission seeks the following from the local authority:**

- 7. The Council places Stage 2 on hold pending the notification and submission process for all remaining zone provisions.

8. Alternatively the Council confirms that submitters will be able to re-submit on signs, earthworks and transport provisions at the time of submissions on zones to be notified as part of Stages 3 and 4 of the Proposed District Plan.
9. Rule 29.4.10 be removed or alternatively amended so to only apply to those areas of the District where there has been a clear identification of the need to reduce the number of private vehicles, and the need and ability to provide for alternative transport methods such as public transport.
10. Table 29.10 be removed or alternatively amended so as to only apply to those areas where there has been a clear identification of the need to reduce the number of private vehicles, and the need and ability to provide for alternative transport methods such as public transport.

The submitter wishes to be heard in support of this submission.

The submitter will consider presenting a joint case with others presenting similar submissions.

Signed on behalf of Willowridge Developments Limited:



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Graeme Morris Todd/Benjamin Brett Gresson

Dated: 23 February 2018