



FORM 6: FURTHER SUBMISSION

IN SUPPORT OF, OR IN OPPOSITION TO,
SUBMISSION ON A NOTIFIED PLAN CHANGE,
VARIATION OR PROPOSED POLICY STATEMENT



Clause 8 of Schedule 1, Resource Management Act 1991



TO // Queenstown Lakes District Council

Name of submitter [full name] Sanderson Group and Queenstown Commercial Limited



FURTHER SUBMISSION // In support of (or opposition to) a submission on the following:

See attached document

I AM [state whether you are]

A person representing a relevant aspect of the public interest; or

[in this case, also specify the grounds for saying that you come within this category]

A person who has an interest in the proposal that is greater than the interest the general public has; or

[in this case, also explain the grounds for saying that you come within this category]

We will be directly affected by any decisions made regarding the Te Putahi Ladies

The local authority for the relevant area.



I SUPPORT (OR OPPOSE) // The submission of:

[Include: name and address of original submitter and submission number of original submission if available]
please see attached document



THE PARTICULAR PARTS // Of the submission I support (or oppose) are:

[clearly indicate which parts of the original submission you support or oppose, together with any relevant provisions of the proposal]
Please see attached document

**THE REASONS** // For my support (or opposition) are:

[give reasons]

Please see attached document

**I SEEK** // That the whole (or part [describe part]) of the submission be allowed (or disallowed):

[give precise details]

Please see attached document

I wish / do not wish*

to be heard in support of my further submission.

I will / will not*

consider presenting a joint case with others presenting similar submissions.

* Select one.

**SIGNATURE**

**Signature

[or person authorised to sign on behalf of submitter]

Date 1 August 2023

** A signature is not required if you make your submission by electronic means.

**YOUR DETAILS** // Our preferred methods of corresponding with you are by **email**

Electronic address for service of submitter [email]erin@edgarplanning.co.nz

Telephone [work]027 251 1921

[home]

[mobile]

Postal Address PO Box 716 Wanaka

Post code

[or alternative method of service
under section 352 of the Act]

9343

Contact person [name and designation, if applicable]Erin Stagg

**NOTE** // To person making further submission**A copy of your further submission must be served on the original submitter within 5 working days after it is served on the local authority.**

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- > it is frivolous or vexatious;
- > it discloses no reasonable or relevant case;
- > it would be an abuse of the hearing process to allow the submission (or the part) to be taken further;
- > it contains offensive language;
- > it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



**Further Submission on Proposed Queenstown Lakes District Plan – Variation –
Te Pūtahi Ladies Mile Masterplan**

Under Clause 8 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council
pdpsubmission@qldc.govt.nz

Name of Submitters: Sanderson Group and Queenstown Commercial Limited

Address for service: Sanderson Group
C/- Edgar Planning Ltd
PO Box 716
Wanaka 9343
Attn: Erin Stagg
erin@edgarplanning.co.nz
027 251 1921

- 1 Sanderson Group and Queenstown Commercial Limited (the **Submitters**) made a submission (OS93) on the Variation to the Proposed Queenstown Lakes District Plan – Te Pūtahi Ladies Mile Masterplan (**Variation 1, PDP**).
- 2 This is a further submission by the Submitters on Variation 1, PDP.
- 3 The Submitters are a person who has an interest in Variation 1, PDP that is greater than the interest that the general public has.
- 4 Queenstown Commercial Limited is a branch of Sanderson Group and has an interest in Variation 1, PDP as the owner of 489 Frankton-Ladies Mile Highway¹, included within the Te Pūtahi Ladies Mile Masterplan area. Sanderson Group has interests in Variation 1, PDP as former owners of the Queenstown Country Club, Kawarau Park, and as developers of the Kawarau Heights residential subdivision.
- 5 The Submitters' further submissions, reasons for submissions and decisions sought are set out in Appendix 1 (**attached**).
- 6 In addition to the specific reasons set out in Appendix 1, the relief sought by the Submitters in this further submission:
 - a. will promote sustainable management of resources and achieve the purpose and principles of the Resource Management Act 1991 (**RMA**);
 - b. represents the most appropriate way to achieve the objectives of Variation 1, PDP, in terms of section 32 of the RMA;
 - c. will assist the Council in carrying out its statutory duties under the RMA including the integrated management of the effects of the use, development, or protection of land;and

¹ Legally described as Section 51, Part Section 45-46 and Part Section 50 Block III Shotover Survey District on Record of Title OT5C/22.

d. will give effect to the National Policy Statement on Urban Development.

7 The Submitters wish to be heard in support of this further submission. If others make a similar submission the Submitters will consider presenting a joint case with them at any hearing.

3 August 2023



Erin Stagg
On behalf of Sanderson Group/Queenstown Commercial Limited

Annexure 1

Name of Original Submitter (and Submission Number)	Submission Point	Decision requested by Original Submitters	Further Submitters' support/oppose	Reason for Further Submitters' support/opposition	Decision Sought by Further Submitters
Threepwood (OS33)	OS33.5	That, whilst opposed to the Variation in its current form, the submitter recognises the need for additional housing and amenities within the masterplan area and is open to working with the QLDC to achieve a workable solution for wastewater and stormwater management, and an active travel link.	Support in part	The Submitters support and seek to be involved in any future process involving solutions for stormwater management.	Accept the relief in part

Department of Conservation (OS44)	OS44.1	That the proposed Variation is not approved unless or until there is adequate offsetting and/ or compensation for the loss of bird habitat, and provision for a consolidated stormwater management approach.	Oppose	It is acknowledged that the plan change would reduce the available land for certain identified bird species to forage. However the current zoning of the area is Rural Lifestyle, which would enable more intensive development than currently exists along Ladies Mile and would also significantly reduce the availability of land for birds to forage on through the construction of buildings, roads, domestic landscaping and an increase in activity including an increase in the number of predators (i.e. cats and dogs) in the area. Further, the ecological reports (included as part of the notified Variation) cannot confirm the contribution the open paddocks of the Ladies Mile make to foraging for birds as they nest in the braided river to the south west and would be more likely to rely on the land adjacent to the river for foraging.	Decline the relief
	OS44.4	That the Variation is not approved unless or until off-site monitoring and effects management measures have been developed and confirmed in relation to native bird species. These could include stand-alone measures, and/or collaboration with, or support for, existing community initiatives	Oppose	The Submitters do not support the requirement for off-site monitoring and/or effects management measures as part of the Variation. The Submitters consider the effects of urbanisation on bird habitat is a wider issue and do not consider that that the plan change should be contingent on monitoring being established as it would require coordination between multiple government	Decline the relief

				<p>agencies, including Council and DOC.</p> <p>In addition it is unclear how effects on native bird populations could be monitored and attributed to the development of Te Pūtahi Ladies Mile rather than development in the vicinity of the Lower Shotover more generally.</p>	
	OS44.6	<p>That an additional matter of discretion be inserted into Rule 27.7.8.1 as follows, or wording to like effect:</p> <p><i><u>"x. ecological and natural values"</u></i></p>	Oppose	<p>Te Pūtahi Ladies Mile is proposed to be a high density area, with some of the highest density development in New Zealand. Requiring consideration and compensation of effects on ecological and natural values would not support achieving the levels of density required and proposed through this plan change.</p>	Decline the relief
	OS44.7	<p>That an additional assessment matter be added to 29.9.8.1 as follows, or wording to like effect:</p> <p><i><u>"x. the extent to which the subdivision protects, maintains or enhances indigenous biodiversity, including through offsetting or compensation measures."</u></i></p>	Oppose	<p>Requiring offsetting and ecological compensation would undermine the intent of the Plan Change, particularly since the loss of foraging habitat in this instance is large open fields that cannot be replaced with trees or other urban vegetation solutions.</p>	Decline the relief
Glenpanel Development Ltd (OS73)	OS73.4	That the generally over-prescriptive nature of the Variation is opposed.	Support	<p>These submissions support the general direction and amendments sought by the Submitters.</p>	<p>Accept the relief to the extent it is consistent with what is sought by the Submitters.</p>
	OS73.5	That the development triggers relating to road access into			

		Ladies Mile from SH6, and Lower Shotover Road are opposed.						
	OS73.6	That the location of the Collector Road type A is opposed.						
	OS73.8	That the layout of Open Space is opposed.						
	OS73.11	That the density in the Medium Density Residential Precinct be set at a minimum of 25- 30 units per hectare.						
	OS73.14	That flexibility is enabled for the collector road or alternative roading and access connections which achieve positive outcomes.						
	OS73.19	That the reference to a supermarket in Policy 49.2.3.1 be deleted.						
	OS73.29	That 49.4.33 (Visitor Accommodation) be amended as follows: <table border="1" data-bbox="757 1015 1115 1054"> <tr> <td>49.4.33</td> <td>Non-complying Permitted</td> <td>Visitor Accommodation</td> </tr> </table>	49.4.33	Non-complying Permitted	Visitor Accommodation			
49.4.33	Non-complying Permitted	Visitor Accommodation						
	OS73.42	That Rule 49.5.50 (Staging development to integrate with transport infrastructure) is deleted.						
Ladies Mile Property Syndicate (OS77)	OS77.6	That Rule 49.5.16.2 (Density) be amended as follows: In the High Density Residential Precinct, development shall achieve a minimum density of	Support	These submissions support the general direction and amendments sought by the Submitters.	Accept the relief, to the extent it is consistent with what is sought by the Submitters.			

		40 60 -72 residential units per hectare across the gross developable area of the site... <u>NC RD</u>			
	OS77.8	That clause (b) of Policy 49.2.6.4, relating to a preference for an underpass to be provided at the Key Crossing be deleted, as follows: Policy 49.2.6.4 Encourage the use of pedestrian and cycling modes by: a. Requiring high-quality, well connected, integrated and legible walking and cycling routes and linking to existing routes outside the Zone; b. Preferring the provision of an underpass for the Key Crossing indicated on the Structure Plan;			
	OS77.12	That the land shown as unformed legal road located to the north of the proposed Collector Type A (as shown respectively on the Zoning Plan and the Structure Plan). which connects to Marshall Avenue in the east be included in the High Density Residential and Medium Density Residential Precincts.			

Waka Kotahi (OS104)	OS104.1	That the proposal is supported in principle as the vision and principles set out in the Transport Strategy are consistent with the outcomes sought by Waka Kotahi.	Support	These submissions support the general direction and amendments sought by the Submitters. Overall it is considered that the proposal can result in the construction of a transit oriented development (TOD) that is largely self-sufficient and helps support a modal shift in transportation in the District.	Accept the Relief
	OS104.3	That Policy 27.3.24.6 (is amended to read as follows: "Avoid development where specific transport infrastructural works in Rules 49.5.10, 49.5.33, 49.5.50 and 49.5.56 have not been completed, unless it can be demonstrated that development will avoid future and cumulative adverse effects from additional traffic movements on State Highway 6. "	Oppose	While the Submitters support the construction of the roundabout and bus stops prior to the development within Te Pūtahi Ladies Mile occurring, they do not support any requirement to construct the underpass prior to development occurring. The Submitters therefore consider that Policy 27.3.24.6 should be retained as notified in order to allow some flexibility should it be demonstrated that specific infrastructural works are not required.	Decline the relief
	OS104.14	That Policy 49.2.6.5 is amended to read; "Avoid development where specific transport infrastructural works have not been completed, unless it can be demonstrated that development will avoid future and cumulative adverse effects from additional traffic movements, particularly at weekday daily peak periods on State Highway 6.	Oppose	While the Submitters support the construction of the roundabout and bus stops prior to the development within Te Pūtahi Ladies Mile occurring, they do not support any requirement to construct the underpass prior to development occurring. The Submitters therefore consider that Policy 49.2.6.5 should be retained as notified in order to allow some flexibility should it be demonstrated that specific	Decline the relief

				infrastructural works are not required.	
	OS104.33	<p>That the following improvements with regard to safety would be required to facilitate the development envisaged by the Structure Plan.</p> <ul style="list-style-type: none"> -Howards Drive Roundabout -Grade-separated crossing points (Howards Drive and Stalker Road vicinity) for pedestrians to achieve cross highway access to buses and schools and wider community. -Shared path connections along the highway and to the underpasses linking to the wider network. -Adequate bus stops on the highway 	Neutral	These changes could potentially provide for safe pedestrian crossing without requiring the construction of an underpass. This aspect is supported by the Submitters.	Accept the relief, subject it being consistent with the Submitters outcomes sought.
	OS104.36	That further discussion with Council is required to provide clarity around how much on-street carparking is being provided.	Neutral	Submitters support and seek to be involved in any future process involving discussions regarding parking provisions.	Accept the relief, subject it being consistent with the Submitters outcomes sought.
Mary Hill Ltd (OS105)	OS105.4	That public transport providers be required to ensure a reliable, frequent and convenient public transport service, and corresponding infrastructure, in order to facilitate a modal shift.	Support	If a modal shift is going to be successful, regular, reliable and frequent public transport will be required.	Accept the relief, to the extent it is consistent with what is generally sought by the Submitters.

	OS105.5	That the provisions be amended to create greater flexibility for commercial, community, and other non-residential activities throughout the HDR precinct so as to allow flexibility in design for apartment style typologies, including housing seasonal staff, offices, and gyms.		These submissions support the general direction and amendments sought by the Submitters.	
	OS105.11	That the policies requiring strict adherence to the Structure Plan are opposed			
	OS105.13	That greater flexibility be allowed for in the design, size, and location of the public park within Sub Area C and otherwise allow flexibility to create smaller and more dispersed parks to assist in managing stormwater if a significant single park is to be pursued.			
	OS105.15	That a potential location for a school zoning/ education area be identified/ indicated within Sub-Area C or otherwise provided for through enabling policy support. An indicative school site is shown on the north side of the State Highway in Appendix E of the submission.			
	OS105.17	That the provisions be amended to enable greater flexibility to ensure the developments are responsive			

		to community demand, whilst encouraging a modal shift.			
	OS105.18	That the building and urban design standards be simplified in order to ensure the TPLM land is able to be developed efficiently and effectively.			
	OS105.19	That, in addition to the specific amendments requested to Table 2 with respect to height, residential density, non-compliance activity statuses set out in Appendix B of the submission, all standards in Table 2 (Standards for activities located in the MDR Precinct and the HDR Precinct relating to building form and design outcomes), which are additional to, or more restrictive than, the Medium Density Residential Standards (in the Resource Management (Enabling Housing Supply and Other Matters) Amendment Act 2021) are opposed in part unless justified by further evidence and Section 32 assessment.			
	OS105.20	That the subdivision regime be simplified through concise objectives, policies, and assessment matters, which seek to achieve an integrated and high quality mixed urban/residential outcome for the Structure Plan area.			

	OS105.21	That the provisions and Structure Plan are amended in order to ensure the rezoning anticipates a realistic and feasible density and height outcome for residential development that will encourage a 'modal shift'.			
	OS105.22	That the provisions and Structure Plan are amended in order to promote the development of alternative modes of transportation (other than private vehicle usage) to complement the increased residential density enabled within the zone.			
	OS105.23	That the provisions and Structure Plan are amended in order to ensure that the requirements for infrastructure upgrades are realistic and proportionate to the development proposed, allowing for appropriate levels of development to occur prior to construction, and ensuring that stormwater is managed appropriately across the Zone to avoid stormwater runoff impacting adjacent landowners.			
	OS105.24	That the provisions and Structure Plan are amended in order to ensure that the affordable housing and development contribution requirements, if any, are			

		determined through this Variation and withdrawn from the Inclusionary Housing variation, and that these provisions are realistic and equitable, taking into account the common infrastructure and community asset land indicated in the Structure Plan, such as to not dissuade affordable and efficient development of the land.			
	OS105.25	That the provisions and Structure Plan are amended to include methods by which the Structure Plan restrictions on development, including infrastructure areas, protected trees, parks, amenity access areas, and recreation, are to be equitably offset/ compensated with landowners.			
	OS105.36	That Policy 49.2.5.5 (renumbered by this submission to 49.2.5.4) be amended as follows: 49.2.5.5 49.2.5.4 Avoid Visitor Accommodation and Residential Visitor Accommodation <u>Provide for seasonal and short term worker accommodation,</u> consistent with the role of the residential amenity outcomes sought for the Zone. <u>in providing for the needs of local residents</u>			

	OS105.45	That Policy 49.2.7.11 be amended as follows: 49.2.7.11 Apply recession plane, building height, yard setback and site coverage controls as the primary means of ensuring a minimum high quality building design through provision for level of outlook, sunshine and light access, while acknowledging that through an application for land use consent an outcome superior to that likely to result from strict compliance with the controls may well be identified.			
	OS105.48	That Council consider including a new definition of seasonal or short term worker accommodation and/ or changes to the residential activity definition to provide for worker accommodation options.			
	OS105.62	That, where possible, standards should be deleted and replaced with policy direction for high quality urban design outcomes, to provide for high quality and varied urban design outcomes.			
	OS105.63	That the activity status of Standard 49.5.16 (Density) be changed from Non complying to Discretionary and the rule be further amended as follows: Residential Density			

		<p>49.5.16.1 In the Medium Density Residential Precinct, development shall achieve an average density of 40 —48 residential units per hectare across the gross developable area of a the site.</p> <p>49.5.16.2 In the High Density Residential Precinct, development shall achieve an average density of 4060 – 72 residential units per hectare across the gross developable area of a the site.</p> <p>For the purpose of this rule, gross developable area of a site means the land within the a site shown on the Structure Plan, excluding the following: Building Restriction areas as shown on the planning maps; Roads, Open Space, Amenity Access Areas and Landscape Buffer as shown on the Structure Plan But including any vested or private roads, reserves, accesses and walkways not shown on the Structure Plan. Note: this standard only applies when a development includes residential activity. NB: The submitter reserves leave to provide evidence and/ or further submissions proposing different, including lower, average densities to those outlined above.</p>			
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Winter Miles Airstream Ltd (OS94)	OS94.4	That the minimum density is amended to 40 units per hectare.	Support	These submissions support the general direction and amendments sought by the Submitters.	Accept the Relief, to the extent it is consistent with what is generally sought by the Submitters.
	OS94.5	That 49.1 be amended as follows: <ul style="list-style-type: none"> • The High Density Residential Precinct provides for high density <u>residential multi-unit</u> accommodation, to a density of at least <u>40</u> 60 units per hectare, in locations close to areas of public open space, future transportation links, and facilities; • The primary Commercial Precinct is centrally located within the Zone and provides a focal point for commercial activities and amenities to serve the resident community <u>while providing for smaller pockets of commercial activity</u>, while ultimately not undermining the role of the commercial areas at Frankton or the Queenstown Town Centre 			

	OS94.10	That 49.2.21 be amended to ensure that 499 Frankton – Ladies Mile Highway (legally described as Lot 2 DP 359142) is not unreasonably restricted by density limits by reducing the density to a minimum of 40 units per ha.			
	OS94.11	That 49.5.16 be amended to remove the exclusions for gross developable area.			
	OS94.20	That Objective 49.2.6 be amended as follows: <u>Traffic generating activity Development</u> in the Zone minimises the generation of additional <u>significant</u> vehicle trips along State Highway 6, and reduces, as far where as <u>as far where as</u> practicable, vehicle trips along State Highway 6 generated by the adjoining residential areas at Ladies Mile.			
	OS94.23	That it should be made clear that providing a pedestrian underpass is not the only way of providing a crossing of the state highway.			
	OS94.31	That 49.2.7.11 be amended to be more flexible.			
	OS94.42	That the provisions be amended to zone the land encompassing Collector Type A as legal road and provide for			

		a land swap mechanism within the provisions.			
	OS94.43	That Rule 49.5.16 be amended to ensure that 499 Frankton – Ladies Mile Highway (Lot 2 DP 359142) is not unreasonably restricted in terms of density limits.			
	OS94.44	That Rule 49.5.16 be amended to reduce the density to a minimum of 40 units per ha and remove the exclusion for gross developable area.			
	OS94.45	That Rule 49.5.18 be amended to reflect recession plan requirements for Tier 1 under the National Policy Statement for Urban Development.			
	OS94.48	That Rule 49.5.21.2 be amended by changing the activity status to Restricted Discretionary.			
	OS94.49	That Rule 49.5.33 be amended by excluding non-critical triggers, namely the following: - bus stops west of SH6 on both sides of the road - the pedestrian/cycle crossing on SH6.			
	OS94.58	That the variation is amended so residential flats are recognised as an ancillary residential use			

Milstead Trust (OS108)	OS108.4	That the density requirements be reconsidered to be lower, encouraging bigger lots.	Support	These submissions support the general direction and amendments sought by the Submitters.	Accept the Relief, to the extent it is consistent with what is generally sought by the Submitters.
	OS108.5	That Rule 49.5.18.1 (Recession Planes) be amended to increase the vertical height above the boundary from which the recession plane starts and increasing the degree of recession from boundaries.			
	OS108.17	That road 'Collector Type A' shown on 49.8 (Structure Plan) be aligned with the existing legal road.			
	OS108.22	That Rule 49.5.16.1 (Density) be amended by replacing 'gross developable area' with 'net developable area'.			
	OS108.23	That Rule 49.5.16.1 (Density) be amended to decrease density.			
	OS108.33	That 49.4.7 be amended to enable residential flats (as defined in the PDP) within the Low density Residential and Medium Density Residential precincts as a permitted activity			