

Submitter Details

First Name: **Alison**
 Last Name: **Devlin**
 Organisation: **Willowridge Developments Limited**
 Street: **PO Box 170**
 Suburb:
 City: **Dunedin**
 Country: **New Zealand**
 PostCode: **9054**
 Daytime Phone: **034749911**
 Mobile: **021969152**
 eMail: **alison@willowridge.co.nz**

Trade competition and adverse effects:

I could I could not

gain an advantage in trade competition through this submission

I am I am not

directly affected by an effect of the subject matter of the submission that :

- a. adversely affects the environment, and
- b. does not relate to the trade competition or the effects of trade competitions.

Wishes to be heard:

Yes

No

Preferred hearing location:

- | | | | |
|---|---|--|---|
| <input checked="" type="checkbox"/> Ch 1 -
Introduction | <input checked="" type="checkbox"/> Ch 2 - Definitions | <input checked="" type="checkbox"/> Ch 3 - Strategic
Direction | <input checked="" type="checkbox"/> Ch 4 - Urban
Development |
| <input type="checkbox"/> Ch 5 - Tangata
Whenua | <input checked="" type="checkbox"/> Ch 6 - Landscape | <input checked="" type="checkbox"/> Ch 7 - Low
Density Residential | <input type="checkbox"/> Ch 8 - Medium Density
Residential |
| <input type="checkbox"/> Ch 9 - High
Density
Residential | <input type="checkbox"/> Ch 10 - Arrowtown
Residential Historic
Management Zone | <input type="checkbox"/> Ch 11 - Large Lot
Residential | <input type="checkbox"/> Ch 12 - Queenstown
Town Centre |
| <input checked="" type="checkbox"/> Ch 13 - Wanaka
Town Centre | <input checked="" type="checkbox"/> Ch 14 - Arrowtown Town
Centre | <input checked="" type="checkbox"/> Ch 15 - Local
Shopping Centres | <input type="checkbox"/> Ch 16 - Business
Mixed Use Zone |
| <input type="checkbox"/> Ch 17 -
Queenstown
Airport Mixed Use | <input checked="" type="checkbox"/> Ch 21 - Rural Zone | <input type="checkbox"/> Ch 22 - Rural
Residential and
Rural Lifestyle | <input type="checkbox"/> Ch 23 - Gibbston
Character Zone |
| <input type="checkbox"/> Ch 26 - Historic
Heritage | <input checked="" type="checkbox"/> Ch 27 - Subdivision and
Development | <input type="checkbox"/> Ch 28 - Natural
Hazards | <input type="checkbox"/> Ch 30 - Energy and
Utilities |
| <input type="checkbox"/> Ch 32 -
Protected Trees | <input type="checkbox"/> Ch 33 - Indigenous
Vegetation and
Biodiversity | <input type="checkbox"/> Ch 34 - Wilding
Exotic Trees | <input type="checkbox"/> Ch 35 - Temporary
Activities and Relocated
Buildings |
| <input type="checkbox"/> Ch 36 - Noise | <input type="checkbox"/> Ch 37 - Designations | <input type="checkbox"/> Ch 41 - Jacks
Point Zone | <input type="checkbox"/> Ch 42 - Waterfall Park |
| <input type="checkbox"/> Ch 43 -
Millbrook Resort
Zone | | | |

Submission

Attached Documents

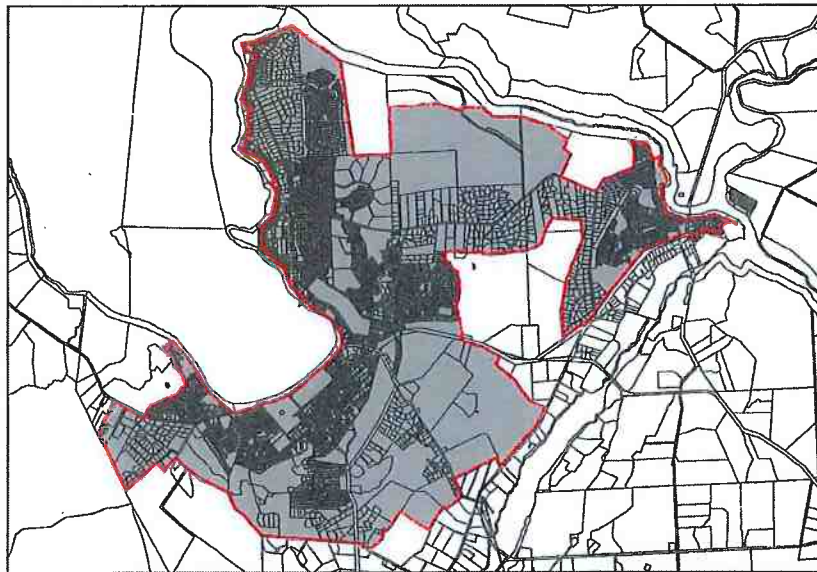
File
Willowridge Attachment 1
Willowridge Attachment 2
Willowridge Attachment 3a
Willowridge Attachment 3b
Willowridge Attachment 4
Willowridge Attachment 5
Willowridge Submission

WILLOWRIDGE ATTACHMENT 1

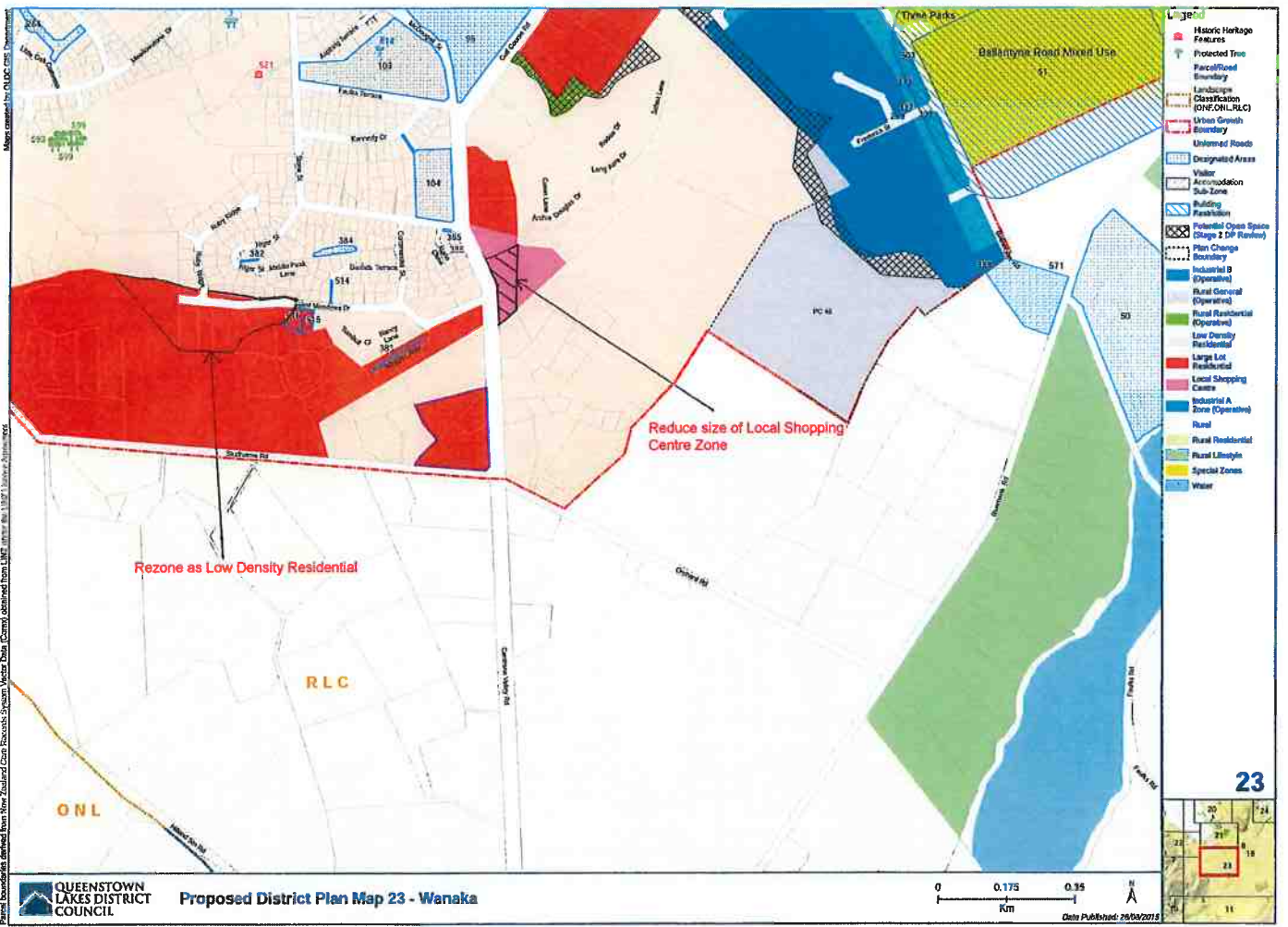
- opportunity for sensitively designed medium density infill development in a contained area closer to the town centre, so as to provide more housing diversity and choice and to help reduce future pressure for urban development adjacent or close to Arrowtown's Urban Growth Boundary.
- a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowtown
- for Feehley's Hill and land along the margins of Bush Creek and the Arrow River to be retained as reserve areas as part of Arrowtown's recreation and amenity resource.
- To recognise the importance of the open space pattern that is created by the inter-connections between the golf courses and other Rural General land

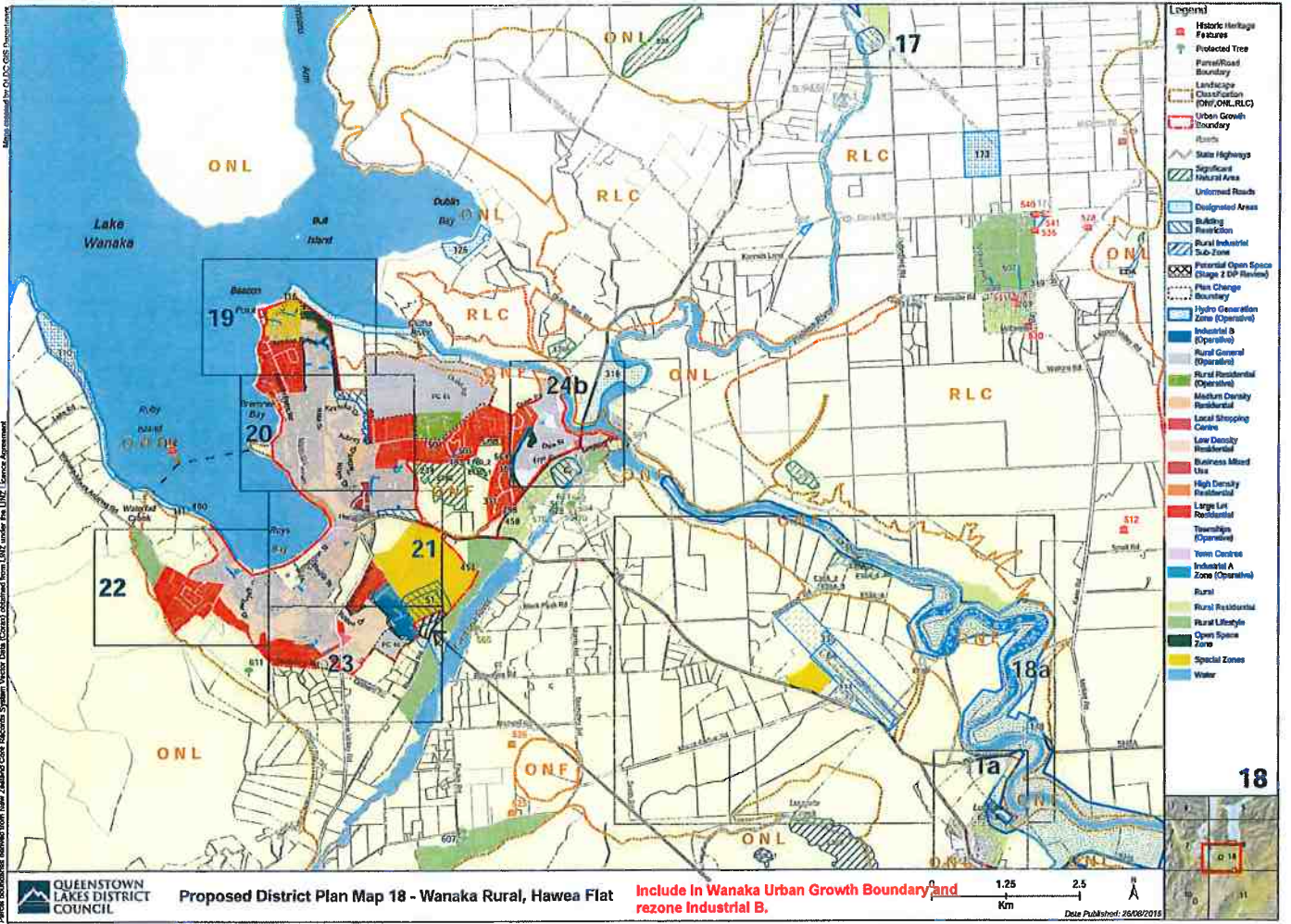
Wanaka

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

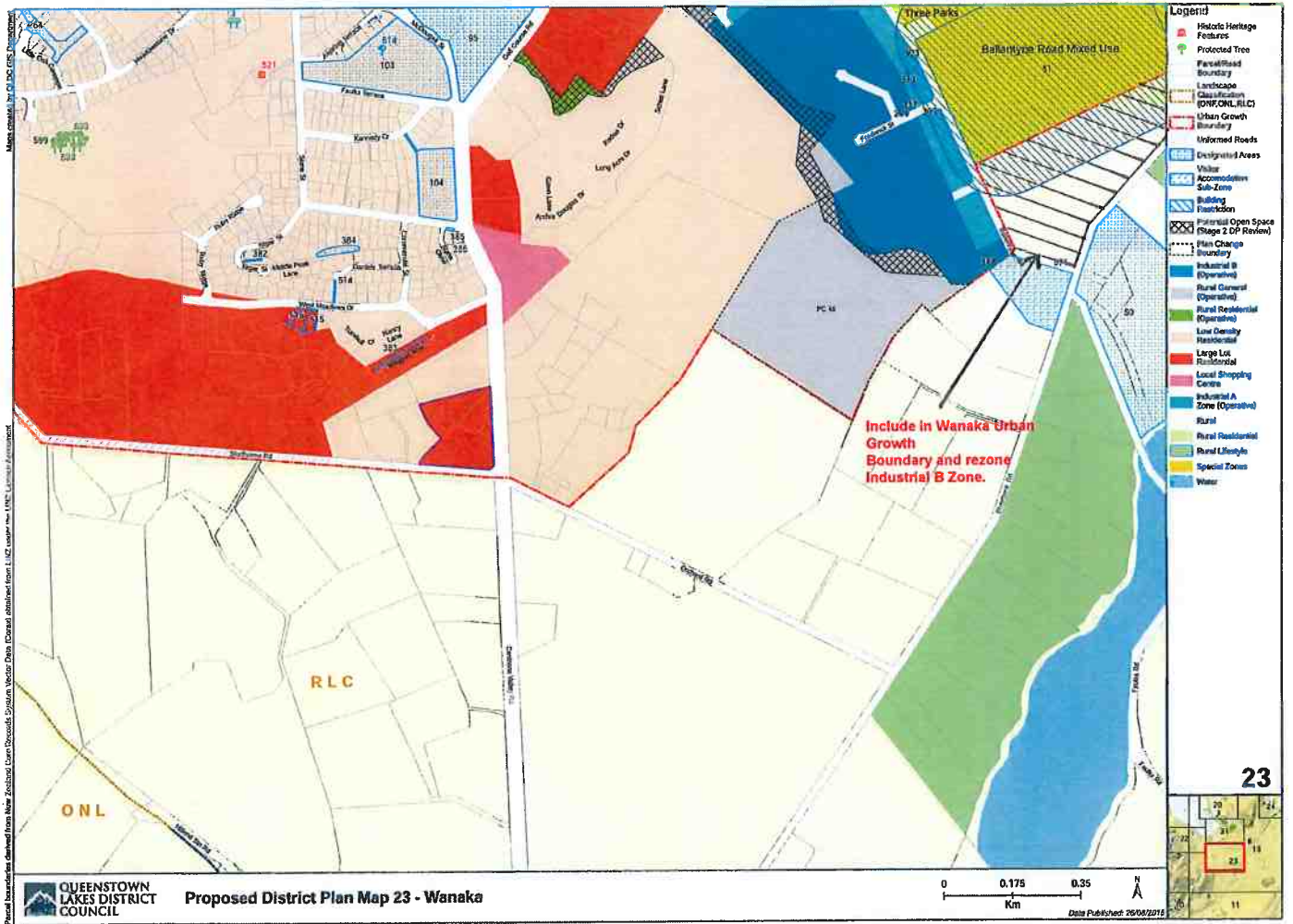


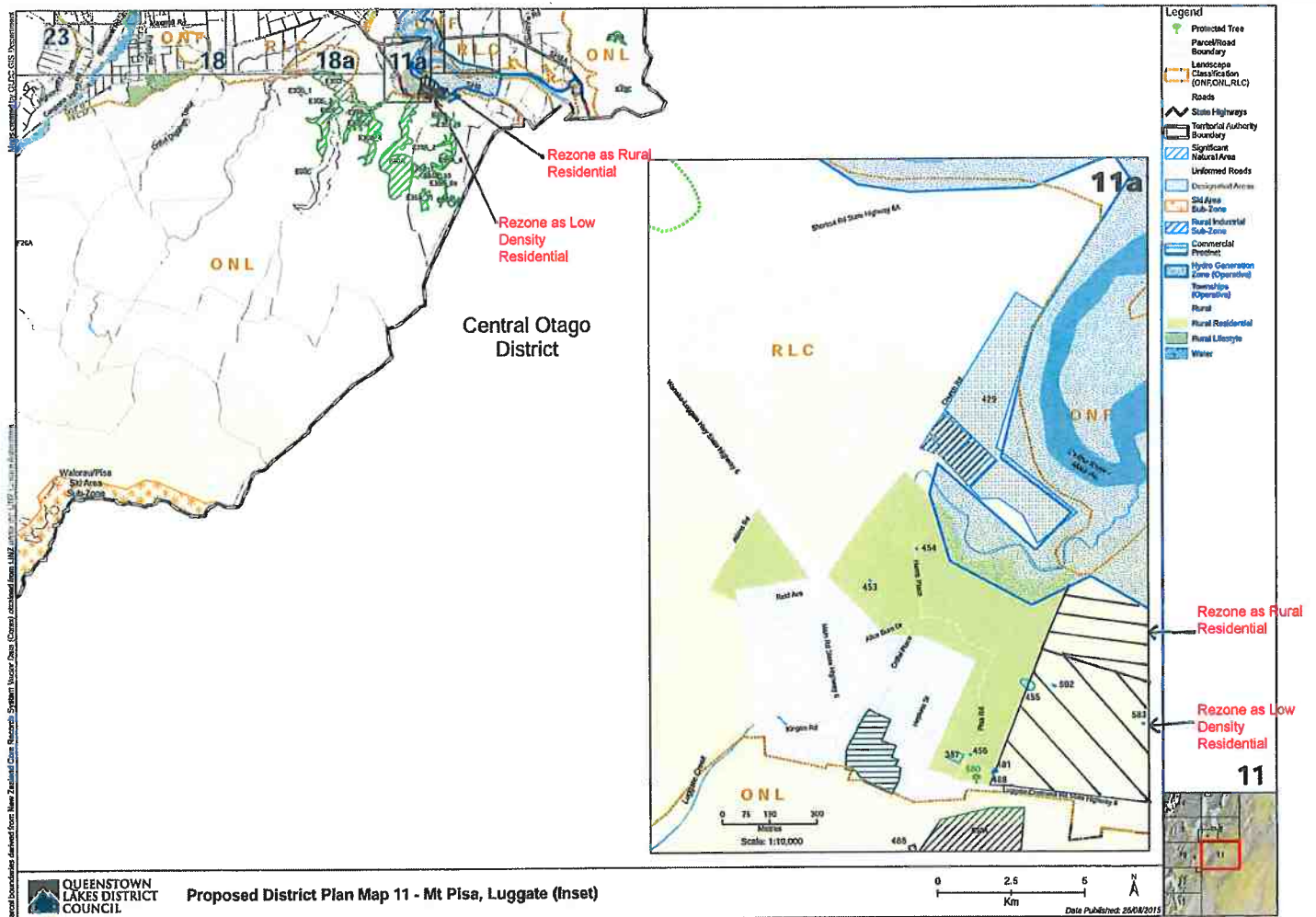
Include Lot 3 DP17123 in Wanaka Urban Growth Boundary

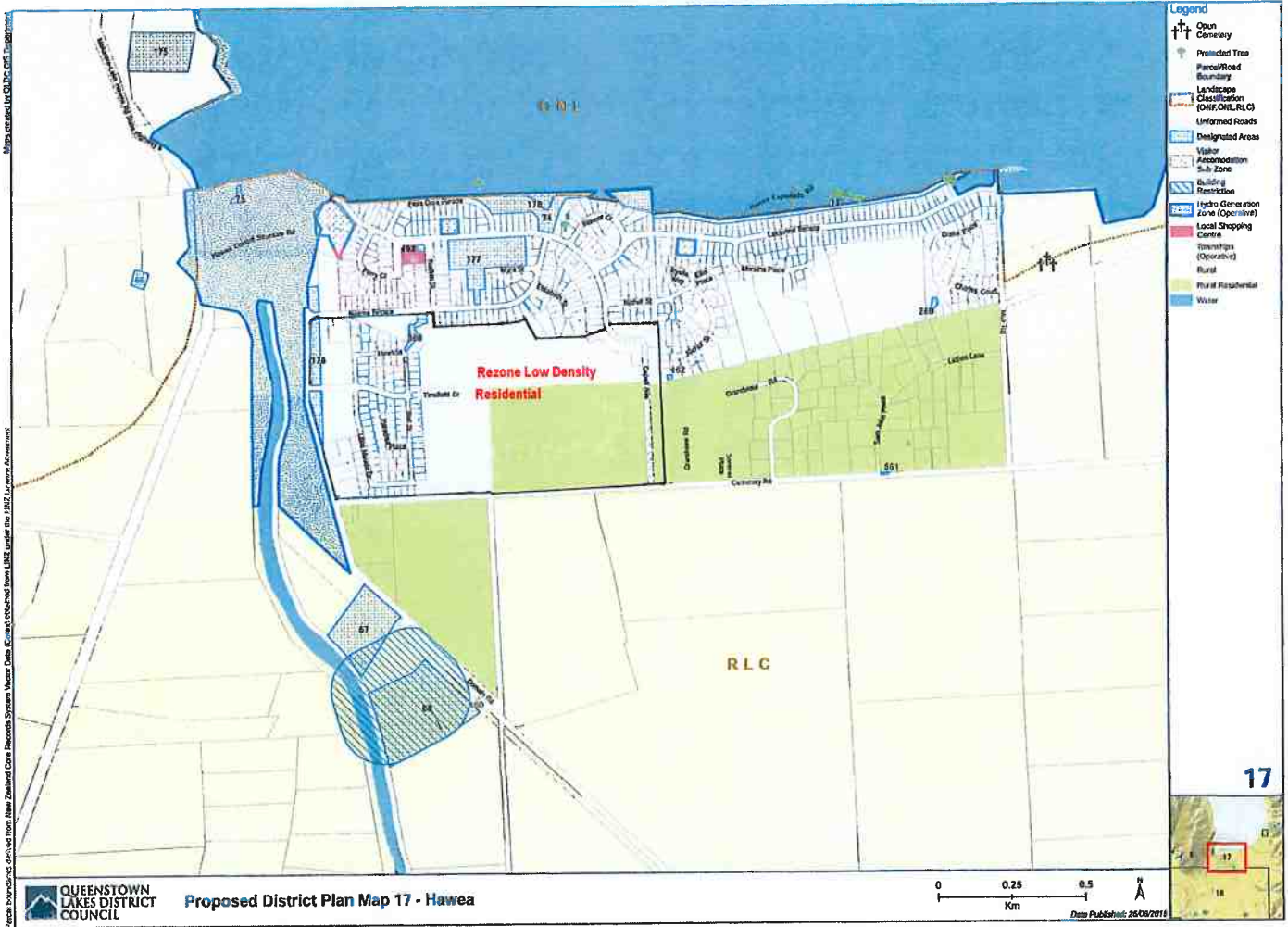




Parcel boundaries derived from New Zealand Core Records System. Vector Data (C2400) obtained from LINZ under the LINZ License Agreement.







Parcel boundaries derived from New Zealand Core Records System Master Data. Crown copyright from LINZ. Licence no. 1002. Licence Agreement:

SUBMISSIONS ON QLDC PROPOSED DISTRICT PLAN BY WILLOWRIDGE DEVELOPMENTS LIMITED

Provision	Support/Oppose	Submission	Relief Sought
<p><i>Entire Proposed Plan</i></p> <p>All Provisions</p>	<p>Oppose</p>	<p>Willowridge opposes the Proposed District Plan as it fails to review all chapters of the District Plan. This disjointed approach is an inefficient process and will lead to poor planning outcomes.</p> <p>The proposed District Plan sets the urban growth boundaries for Queenstown, Wanaka and Arrowtown. It is important that the land within the urban growth boundaries is appropriately zoned to provide for the residential and economic growth of the urban areas within the life of the Plan. In order to achieve the correct zoning all zoning options should be available for consideration. It is impossible to correctly zone land within the urban growth boundaries without the business and industrial zones being included as part of the review. Exclusion of the Township Zones is also problematic and could result in growth and development within the Districts townships being unduly stifled or inappropriate zoning applied to enable growth within townships in advance of the township zone being reviewed. There are no apparent advantages to the piecemeal approach taken in reviewing the District Plan in two stages.</p>	<p>Willowridge submits that the entire District Plan review should be put on hold or rejected until such a time as the remaining chapters are included in the review.</p>
<p><i>Strategic Direction</i></p> <p>Objective 3.2.1.1 and policies 3.2.1.1.1 to 3.2.1.1.3</p> <p>Objective 3.2.1.2</p>	<p>Oppose</p>	<p>Objective 3.2.1.1 and related policies refer to the <i>Queenstown and Wanaka central business areas</i>. These central business areas are not identified on the maps and there is no definition of 'central business area'. It is therefore unclear what areas they relate to.</p> <p>There are a number of key business areas in Queenstown and Wanaka:</p> <ul style="list-style-type: none"> • The existing town centres; • Three Parks and Anderson Heights in Wanaka; • Remarkables Park and Five Mile in Queenstown. <p>These areas are all hubs of the resort's and Districts economy where economic activity and growth should be focused.</p>	<p>Objective 3.2.1.1</p> <p>Recognise, develop and sustain the Queenstown and Wanaka <u>central business and commercial</u> areas as the hubs of New Zealand's premier alpine resorts and the District's economy.</p> <p>Policies</p> <p>3.2.1.1.1 Provide a planning framework for the Queenstown and Wanaka <u>central business and</u></p>

		<p>Objective 3.2.1.2 seeks to recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka central business areas. If the Queenstown and Wanaka central business areas exclude areas such as Three Parks then objective 3.2.1.2 will undermine the function of Three Parks as a key economic centre servicing the wider District.</p> <p>The objectives and policies should be reworded to ensure all key economic areas are included.</p>	<p>commercial areas that enables quality development and enhancement of the centres as the key commercial hubs of the District, building on their existing functions and strengths.</p> <p>3.2.1.1.2 Avoid commercial rezoning that could fundamentally undermine the role of the Queenstown and Wanaka central business and <u>commercial</u> areas as the primary focus for the District's economic activity.</p> <p>3.2.1.1.3 Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka central business and <u>commercial</u> areas.</p> <p>Objective 3.2.1.2 Recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka central business and <u>commercial</u> areas in the District.</p>
Policy 3.2.2.1.6	Oppose	<p>Policy 3.2.2.1.6 seeks to ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships to reduce the incentive for land banking in order to address housing supply and affordability.</p> <p>This policy is a flawed for a number of reasons:</p>	<p>Delete policy 3.2.2.1.6</p>

		<ul style="list-style-type: none"> - It will result in a poor planning outcome. Land should be rezoned based on its suitability for development and not based on the land ownership. - Landowners are not necessarily land developers and may end up not developing the land, which will have the same effects as land banking. - Landowners who do not have the expertise or financial ability to develop their land may sell to established development companies (such as those the policy is presumably trying to avoid) 	
<i>Urban Development</i>			
4.2.6 Wanaka Urban Growth Boundary	Oppose	<p>Section 4.2.6 includes a map showing the proposed Wanaka Urban Growth Boundary. This boundary should be extended to include Lot 3 DP17123 as shown on Attachment 1.</p> <p>This parcel of land is adjacent to both the Three Parks Special Zone and the Ballantyne Road Mixed Use Zone and is opposite Ballantyne Road Industrial Zone. Lot 3 can make a valuable contribution in terms of the provision of additional industrial land in an area where such activity is already focused.</p> <p>The land zoned within Three Parks is for business activity and the supply of land zoned, or proposed to be zoned industrial B on the opposite side of Ballantyne Road is limited.</p> <p>It is important that the District Plan zones sufficient employment land to encourage and enable new business and industrial activity in Wanaka for the lifetime of the plan. Including this area of land will assist in ensuring sufficient land is available for urban growth.</p>	Include Lot 3 DP17123 within the Urban Growth Boundary for Wanaka.
<i>Landscape</i>			
6.3.1.3	Oppose	<p>Policy 6.3.1.3 requires that subdivision and development proposals within and Outstanding Natural Landscape or Outstanding Natural Feature be assessed against the assessment matters in provisions 21.7.1 and 21.7.3. The policy goes on to state that subdivision and development is inappropriate in almost all ONL or ONF locations,</p>	<p>Policy 6.3.1.3 That subdivision and development proposals located within the Outstanding Natural Landscape or an Outstanding Natural Feature be</p>

		<p>meaning successful applications will be exceptional cases.</p> <p>The proposed ONL and ONF boundaries cover broad areas within the District. Within these broad areas there will be some areas that are suitable for subdivision and development. The wording of the policy is a very strong presumption against any subdivision or development and pre-empts the outcome of an assessment against the assessment matters.</p> <p>The detailed assessment matters referred to by the policy will enable a thorough assessment of whether development is acceptable. The policy should not pre-empt the outcome of this.</p>	<p>assessed against assessment matters in provisions 21.7.1 and 21.7.3 because subdivision and development is inappropriate in almost all locations, meaning successful applications will be exceptional cases.</p>
<i>Low Density Residential</i>			
7.5.5	Oppose	<p>Rule 7.5.5 of the Low Density Residential Zone provides for building coverage of 40%. The minimum lot size for the Low Density Residential Zone is 450m². At 40% coverage a 450m² lot could accommodate a building of 180m² ground floor area including garage, which is likely to be too small for many people. The building coverage should be increased where smaller lots are provided for.</p>	<p>Provide for 50% building coverage for lots between 450m² – 700m².</p>
<i>Local Shopping Centre Zone</i>			
15.4	Oppose	<p>The rules in the Local Shopping Centre Zone are permissive of commercial and retail activities and seem to provide for a range of activities from small scale shopping to supermarkets. This has the potential to undermine the town centres and other commercial centres, particularly where the land zoned neighbourhood shopping centre of a significant size, such as the neighbourhood shopping centre on Cardrona Valley Road.</p>	<p>Include rules in 15.4 to restrict retail activities to those providing a local service (dairies, off-license, bakery) with a gross floor area of no more than 400m², or rules to a like effect.</p>
<i>Rural Zone</i>			
21.7.1.1	Oppose	<p>Section 21.71 sets out the assessment matters (landscape) for Outstanding Natural Features (ONF) and Outstanding Natural Landscapes (ONL). The matters listed in 21.7.1.3 to 21.7.1.6 are sufficient to enable a thorough assessment of the appropriateness of a subdivision or development. Assessment matter 21.7.1.1. which states that 'the assessment matters are to be stringently applied to the effect that successful applications will be exceptional cases' is</p>	<p>Delete assessment matter 21.7.1.1.</p>

		unnecessary and could predetermine the outcome of applications in ONF's and ONL's.	
21.7.1.2	Oppose	<p>Assessment matter 21.7.1.2 relates to vegetation that was planted or self-seeded and less than 1m in height at 28 September 2002 and obstructs or substantially interferes with views of the proposed development from roads or other public places and states that such development shall not be considered beneficial under any of the assessment matters and as part of the permitted baseline. This assessment matter is inconsistent with the provision that planting is a permitted activity and therefore part of the permitted baseline.</p> <p>Furthermore, screen planting is often used as a mitigating factor for new development. The issue of whether the screen planting exists or is proposed should be irrelevant as existing screen planting can be protected by way of a condition of consent and can therefore be relied upon as mitigation.</p> <p>Assessment matter 21.7.1.2 does not meet the purpose of the Act in terms of mitigating effects on the environment.</p>	Delete assessment matter 21.7.1.2
<i>Subdivision and Development</i>			
27.4	Oppose	<p>Rule 27.4.1 provides for all subdivision as a Discretionary Activity, unless otherwise stated.</p> <p>Where a subdivision activity complies with all the relevant standards for the Zone within which it lies, it is unreasonable for Council to retail discretion over the determination of the application. This is particularly relevant for urban zones, such as the Residential Zones where residential subdivision is an anticipated activity.</p>	Add new rule providing for subdivision in the residential zones as a controlled activity.
27.5.1	Oppose	<p>The table contained at 27.5.1 sets out minimum lot sizes for each zone. The minimum lot size for the low density residential zone is 450m². This is significantly smaller than the current minimum lot size for Wanaka of 700m². Willowridge is concerned that this reduction in minimum lot size could have an adverse effect on the character of the town.</p>	Increase the minimum lot size for low density residential development in table 27.5.1 to 700m ² .
<i>Maps</i>			

Map 23	Oppose	<p>Map 23 identifies an area of land to the north of Studholme Road and around West Meadows Drive as Large Lot Residential. This area of zoning does not take into consideration the existing urban environment or existing land boundaries.</p> <p>The West Meadows Drive area is a low density residential environment. Much of the area is already developed and titles have recently been issued for the West Meadows Stage 5 to the south of West Meadows Drive and north of Maggies Way. The uptake of low density residential land at this location is high.</p> <p>The remaining large lots immediately to the south of West Meadows Drive are serviced from West Meadows Drive and considered as part of the West Meadows subdivision. Developing these large lots to low density residential density would be a more sustainable use of land at this location; would be consistent with the character of the West Meadows subdivision; and would meet the existing demand for low density residential allotments at this location. The Large Lot Residential Zone boundary should be amended to exclude the West Meadows land.</p> <p>It is also noted that there are some existing low density residential lots to the north of West Meadows Drive that are partially zoned Large Lot Residential. This is inappropriate given the existing lot size and is also confusing to property owners. The line should be amended to address this.</p> <p>Map 23 also contains the Cardrona Valley Road Local Shopping Centre Zone. The area of this zone is significantly greater than that identified in the Wanaka Structure Plan. Willowridge submits that the size of this zone is beyond what could be considered a 'local shopping centre' at this location and it could have the potential to undermine the Wanaka town centre and the Three Parks Commercial Core.</p>	<p>The Large Lot Residential boundary at Studholme Road/West Meadows Drive should be amended as per Attachment 2.</p> <p>The Neighbourhood Shopping Centre on Cardrona Valley Road is reduced in size as per Attachment 2 and any consequential changes to other Maps.</p>
Map 18 and Map 23	Oppose	<p>Lot 3 DP17123 is shown on Maps 18 and 23 as Rural Zone. This parcel of land is adjacent to both the Three Parks Special Zone and the Ballantyne Road Mixed Use Zone and is opposite Ballantyne Road</p>	<p>Rezone Lot 3 DP17123 as Industrial B Zone and include within the Wanaka Urban Growth Boundary as shown</p>

	<p>Industrial Zone. Lot 3 can make a valuable contribution in terms of the provision of additional industrial land in an area where such activity is already focused. Lot 3 should be included within the Wanaka Urban Growth Boundary.</p> <p>The land zoned within Three Parks is for business activity and the supply of land zoned, or proposed to be zoned industrial B on the opposite side of Ballantyne Road is limited.</p> <p>It is important that the District Plan zones sufficient employment land to encourage and enable new business and industrial activity in Wanaka for the lifetime of the plan. Including this area of land will assist in ensuring sufficient land is zoned.</p>	<p>on Attachments 3a and 3b and any consequential changes to other Maps.</p>
<p>Map 11</p>	<p>Oppose</p> <p>Map 11 contains Luggate and surrounding areas. The land zoned Rural Residential and Rural to the north and east of the Luggate Township is the Luggate Village development land. Stages 1A, 1B and K of the development are complete.</p> <p>The next stages of the development, Stage 2A and 2B have been consented through RM060392 and RM060393 (and subsequent extensions of lapse periods). Provision has been made for these stages within the existing infrastructure.</p> <p>Willowridge Developments Limited acquired the Luggate Village land in 2015 and intends to commence development of the next stage as part of its 2016 programme of works.</p> <p>The 2A subdivision proposes Low Density Residential density development and the 2B subdivision proposes Rural Residential Zone density. The proposed District Plan Maps should reflect this use of the land in order to make the zoning consistent with the intended land use.</p>	<p>Rezone land to the east of Luggate Township as Low Density Residential and Rural Residential as per Attachment 4 and any consequential changes to other Maps.</p>
<p>Map 17</p>	<p>Oppose</p> <p>Map 17 relates to Hawea. Much of Hawea is zoned Township with a minimum lot size of 800m². Some of the land to the south of Hawea is zoned Rural Residential, which has a minimum lot size of 4,000m². Willowridge owns land between Domain Road, Noema Terrace, Capell Avenue and Cemetery Road known as Timsfield. Part of this land is zoned as Township and part is arbitrarily zoned as Rural</p>	<p>Rezone land at Hawea Low Density Residential as per Attachment 5 and any consequential changes to other Maps.</p>

		<p>Residential.</p> <p>Willowridge has developed Timsfield as a more affordable alternative to living in Wanaka. The sections are consistently popular and Willowridge aims to continue to provide these affordable sections. The zoning of this land is unchanged from that of the operative District Plan. Willowridge is disappointed to see the arbitrary area of Rural Residential land remain over what is a valuable land resource for meeting affordable housing needs.</p> <p>The township zone provides for 800m² sections. Willowridge considers this to be too large and an inefficient use of the land.</p> <p>Willowridge submits that the land shown on Attachment 5 should be rezoned as Low Density Residential in order to ensure an on-going supply of affordable residential sections and to ensure the most efficient use of the land resource.</p>	
--	--	--	--