

IN THE MATTER of the Resource Management Act ('Act')

AND

IN THE MATTER Queenstown Lakes Proposed District Plan – Stage 2 (Hearing
Stream 15 – Visitor Accommodation Variation)

**SUPPLEMENTARY EVIDENCE – BRIDGET ALLEN ON BEHALF OF GREENWOOD
GROUP LIMITED (SUBMITTER 2552)**

24 September 2018



1. My name is Bridget Allen. I am here today to present expert planning evidence on behalf of Greenwood Group (2552) in relation to the provision of a VA Subzone for two contiguous parcels of land at 8 Frankton Road legally described as Lots 1-2 DP 99459 (**Site**).
 2. My primary evidence has been pre-circulated in accordance with the directions issued by the Chair of the Hearings Panel.
 3. I have read Ms Devlin's rebuttal evidence dated 22 August 2018 in which she has affirmed her s42A recommendation that a VASZ over the site is not the most appropriate way to meet the notified policy framework for restricting visitor accommodation within the Medium Density Residential Zone (**MDR**). I have also listened to the recording of Ms Devlin's evidence to the Hearings Panel on **4 September 2018**.
 4. *The Council section 32 evaluation and S42 Report both state that the key focus of the VA provisions was to address the use of residential dwellings/units for short term visitor accommodation activities, particularly, adverse effects on residential housing supply and affordability.*¹
 5. The intention of the plan change is to restrict the higher intensity of RVA and provide for VA in appropriate locations within sub zones within the MDR. As stated in the purpose of the MDR:

"Visitor accommodation is restricted, except within the medium density residential visitor accommodation sub-zones... The commercial letting of residential properties as visitor accommodation on a year- round or permeant basis, is restricted, particularly where it would result in a loss of housing supply..."
 6. This submission is seeking a subzone for VA (as opposed to higher intensity RVA).
 7. The sub-zone does not prioritise visitor accommodation or preclude residential development but simply provides for both.
 8. Higher density development and VA in close proximity to the Queenstown Town Centre more appropriately aligns with the objectives and policies of the Chapters 3 and 4 (Strategic Direction and Urban Development) of the PDP. Ms Devlin rejects the submission on the basis that it doesn't align with the intention of the plan change and the objectives and policies. As mentioned above the intention is to restrict hi RVA not VA and the purpose of the MDR zone and the objectives and policies provide for VA in the MDR zone if it is located within the VA subzone.
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9. Given the above, what needs to be considered is whether the site is appropriate for a VASZ. If it is then a VASZ over the site will align with the purpose, objectives and policies of the zone and the overarching PDP objectives and policies, the NPS on Urban Development Capacity and the RMA.

¹ Para 1.2 of Mr Barrs Section 32 Evaluation 26 August and Para 6.8 Section 42A report of Amy Bowbyes 23 July 2018

10. The following attributes make the Site ideal for visitor accommodation:
- a) The location and proximity to the town centre.
 - b) The location adjacent to the gardens reserve and open space.
 - c) The sites frontage onto Frankton Road.
 - d) Its consistency with historic settlement patterns and adjoining visitor accommodation development that follow the arterial routes into town centres.
 - e) That it is a large undeveloped flat site and that the site is bounded by two streets.
 - f) The scarcity of available sites that have these attributes.
 - g) May assist in alleviating the demand on other types of VA such as permanent letting of individual houses in the surrounding areas.
11. I have attached a map showing the existing VA development pattern along Frankton Road. This receiving environment has been considered in previous non-notified consents granted for the Site which support this submission that VA is appropriate in this location.
13. Ms Devlin has previously stated that the area is appropriate for HDR zoning which provides for VA but then suggests VA isn't appropriate on the basis it is now zoned MDR. In my opinion the most appropriate test needs to look beyond the fact the site is now zoned MDR and look to the ability for VA rules to 'most appropriately' provide for the VA and MDR objectives and policies in the context of this receiving environment
14. Ms Devlin agrees that it may be possible to contain the effects of VA in this location, with the relevant bulk and location standards and matters for discretion².
13. For the reasons above and the benefits, cost and efficiency assessment contained in my primary evidence I consider a subzone over the site to be more appropriate than the notified version as it provides for VA or residential development and most appropriately aligns with the policies and objectives of the PDP.
14. I am happy to answer questions from the Panel.

Bridget Allen



24 September 2018

² Para 5.3 Ms Delvin's Rebuttal Evidence

APPENDIX 1 - VISITOR ACCOMMODATION ALONG FRANKTON ROAD

