

## **SUMMARY OF STATEMENT OF EVIDENCE OF JOANNE SKUSE FOR TOPP PROPERTY INVESTMENTS 2015 LTD**

### **Future Growth Overlay and Residential Zoning**

The Future Growth Overlay and Residential Zoning are important topics that are addressed by PC 19. The report makes comment on the Future Growth Overlay, which is intended to ensure that land is set aside for future urban growth in a way that is sustainable and efficient. I have given evidence that the National Policy Statement on Urban Development (NPS-UD) applies to Central Otago's urban areas. This is of utmost importance as Tier 3 local authorities (of which I have given evidence that CODC is one) need to zone sufficient land for growth, for the short, medium and long term. The future growth overlay proposed through PC 19 does not zone this land and therefore does not comply with the intent of the NPS-UD of which CODC is required to give effect to.

I have also given evidence that the number of 10,000 stated in the NPS-UD is a compilation of the housing market and the labour market. There are interdependencies between different areas where people commute for work, and this means that they are part of the same housing and labour market. Neighbouring Councils such as Queenstown Lakes and Gore have assessed their districts this way and acknowledged the obligation to implement Parts 2 and 3 of the NPS-UD.

I have given evidence that in order to implement the Objectives and Policies of the NPS-UD, sufficient plan-enabled land needs to be provided for over the medium to long term. Part 3.4(1)(b) of the NPS-UD is relevant and states that land needs to be zoned for housing or business use in a proposed district plan. However, the current Plan Change proposal does not intend to zone the land located within the Future Growth Overlay as urban but proposes to leave it rural. The land is therefore not plan enabled and 3.4 of the NPS-UD cannot be met.

Overall, it is important to consider the Future Growth Overlay and Residential Zoning carefully in order to ensure that they are in line with the objectives of the NPS-UD. This will require careful planning and consideration of the housing and labour markets in the area, as well as the need to provide sufficient plan-enabled land for future growth.

### **Comprehensive Development**

I have observed that structure plans could be consented in lieu of a plan change for land earmarked as Future Urban Growth Overlay, which has been deemed inappropriate by the section 42A report. I have however also suggested an alternative approach to zone the Future Growth Overlay land Low Density Residential, as intended by the Vincent Spatial Plan, and require a Comprehensive Residential Development application (or spatial plan as many other district plans require in this type of situation) as a Discretionary Activity. This approach would allow the Future Urban Growth Overlay land to be zoned urban, achieving compliance with the NPS-UD. Furthermore, this approach would also address the matters raised in the section 42A report at paragraph 85 by requiring infrastructure capacity to be addressed.

The relief sought would enable a much more efficient process to achieve the same desired outcome.

### **Minimum Lot size and Density**

Another misstep from the NPS-UD is the density enabled under the Plan Change. The Low Density Residential zone proposed to double the density from 250m<sup>2</sup> to 500m<sup>2</sup> (now amended to 400m<sup>2</sup>). Increasing the density reduces the opportunity for additional housing stock to be brought to the market, which in turn means that houses will become more expensive. Therefore, PC 19 does not meet Objective 2 of the NPS-UD.

The submitters site is large and could successfully be developed comprehensively with a density of generally 1 dwelling per 250m<sup>2</sup>/300m<sup>2</sup>. Several other sites will also fall into this sort of scenario. This flexibility enables a market lead approach, achieving efficient urban form, benefits to housing affordability and demand and sufficient housing choice.

Relief is sought that as part of a comprehensive development application in the Low Density Residential Zone, a density (and corresponding lot size) of 250m<sup>2</sup> would be allowed for.

Overall, it is recommended that the Future Urban Growth Overlay land be zoned as Low Density Residential with a requirement for a Comprehensive Residential Development application. The density and corresponding and corresponding minimum lot size of 1 dwelling per 250m<sup>2</sup> should apply.