
**BEFORE THE HEARINGS PANEL ON BEHALF OF CENTRAL OTAGO DISTRICT
COUNCIL**

UNDER THE The Resource Management Act 1991 (**Act**)
IN THE MATTER of Plan Change 19 Residential Chapter Provisions
BETWEEN **SUGARLOAF VINEYARDS LTD**
AND **CENTRAL OTAGO DISTRICT COUNCIL**

STATEMENT OF EVIDENCE OF JOANNE SKUSE FOR SUGARLOAF VINEYARDS LTD

INTRODUCTION

1. My full name is Joanne Skuse.
2. I hold the qualification of Bachelors of Law (LLB) from the University of Exeter, United Kingdom. I have 5.5 years' experience in planning and resource management, and I also hold New Zealand Planning Associate membership.
3. I am a Senior Planner at The Property Group, and I have worked at The Property Group since 10 May 2021.
4. My recent project work has included advising on multiple master planned subdivision proposals, including undertaking environmental effects assessments for both rural and urban subdivisions, preparing consent applications, consultation with affected and interested parties and appearing

at Council hearings. In addition, I have also been involved in a number of large scale projects that have dealt with the amenity effects, and reverse sensitivity effects of change in land use in rural areas.

5. I have been involved in the Gore District Council Proposed Plan review as a Consultant drafting district wide and location specific chapters. I have also lead the preparation of a residential development area, upzoning rural land appropriately for urban development.
6. Directly prior to joining The Property Group I was employed at the Queenstown Lakes District Council (**Council** or **QLDC**) from February 2017 to April 2021, where I held role of Planner.
7. As part of my roles at QLDC I processed numerous consent applications in the QLDC urban areas and for sites within the rural Outstanding Natural Landscape and Rural Character Landscape areas.

Code of Conduct

8. I have read the Environment Court's Code of Conduct for Expert Witnesses in the Environment Court of New Zealand Practice Note 2014, and I agree to comply with it. My qualifications and experience as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

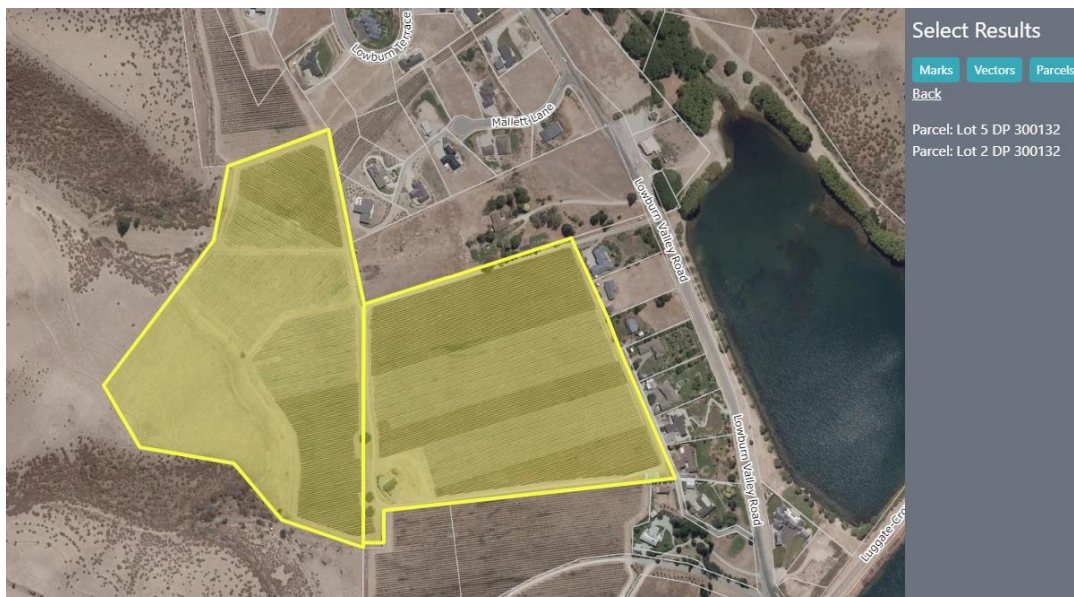
SCOPE OF EVIDENCE

Site description

9. The scope of this submission is the same as that that was lodged in the submitter's initial submission on the Proposed Plan Change. This evidence makes comment on the recommending report. While I agree with many of the recommendations that have been made in response to the submissions that have been received, there are still many outstanding issues (and consequential amendments that are sought).
10. This evidence focuses on the reduction in the minimum lot size proposed for the Large Lot Residential – Precinct 2 in its entirety, or specifically to the submitters land. The submitter is also asking for a density of one unit per

250m² and that the Comprehensive Residential Development suite of Objectives, Policies and Rules to apply to the site.

11. For clarity the submission that was lodged referred to the entire LLRZ Precinct 2. The submitter owns the following sites within the LLRZ Precinct 2. Lot 2 DP 300132 and Lot 5 DP 300132.



COMMENT ON PLANNING REPORT

Minimum Lot size and Density

12. As was discussed in the initial submission it is considered that the NPS-UD applies to Central Otago's urban areas. The email that was attached within Appendix 2 of the Section 42A report from Mike Hurley does not appear to confirm that CODC does not meet the criteria to be considered a Tier 3 local authority. Rather this email simply spells out what the NPS-UD states.
13. As discussed in my evidence for Submission #161, in my opinion I consider the NPS-UD applies to CODC and that there are multiple urban environments within CODC.
14. A key Policy of the NPS-UD is Policy 2, which applies directly to CODC as a Tier 3 local authority, and requires CODC to provide at least sufficient development capacity to meet expected demand for housing in the short, medium and long terms. This is a minimum requirement and supplying

additional capacity will better achieve many of the NPS-UD outcomes identified above.

15. The Growth Projections 2022 report by Rationale does not appear to include Lowburn. Therefore, it is difficult to determine what is projected for the Lowburn area. The section 42a discusses the maintenance of amenity and justifies the increased density based on this fact.
16. Submission #83 requests inclusion within the Large Lot Residential Precinct 2 applied to Lowburn, this highlights that development and growth in this area is desired and there are potential for larger greenfield sites. Furthermore, as Lowburn is within the water scheme catchment it is considered urban and is an efficient use of land for development.
17. As stated in the original submission, the existing Residential Resource Areas 1-13 are mostly proposed to be rezoned Large Lot Residential in some form. Out of the 13 residential areas, only 3 areas (RRA(6), RRA(7) and RRA(12)) will be able to undertake infill/further development. Five areas will retain their current Lot size and five areas will be subject to a more restrictive lot size requirement.
18. The section 32 evaluation report stated that Lowburn was part of the Large Lot. It is hard to understand why is it proposed to have a lot size so much larger when compared to Bannockburn (2,000m²) and Pisa Mooring which is further away from Cromwell (1,000m²). Is it necessary to provide so many varying lot sizes across the Large Lot Zone?
19. The Section 42a report asserts that the 3,000m² density in Precinct 1 is to maintain existing character and amenity. The NPS-UD acknowledges that amenity isn't static and is different for different people (Policy 6b). Changes in amenity is not necessarily an adverse effect. Regardless, the Large Lot Zone Precinct 2 still provides sites for larger homes and ample open space, at 1,500m². This is supported by Policy 6c. Freezing the zone in time, and relying on all growth to be focused on the MDR zone in my opinion does not achieve

a well-functioning urban environment¹. As this Plan Change is occurring ahead of a full District Plan review and will be reasonably 'new' policy at the time of the full plan review, it may not be revisited. As such, the density standards proposed now will be in place for at least the next 10 years if not longer (history suggests that in practice provisions are reviewed after more than 10 years have passed, and that any review process including appeals can itself take many more years). They are therefore short-sighted. Growth in the Large Lot Density zones should be enabled via infill development. It is not sustainable, or an efficient use of land, to rely on greenfield development alone to provide for the necessary growth.

20. For vacant Lots, within the Large Lot Residential Precinct 2, the submitter seeks a minimum lot size of 1,500m². This is smaller than what the current plan provides in relation to lot size and will enable some infill development.
21. Consistent with the submitter's original submission, I also consider PC-19 is not giving effect to the NPS-UD as it effectively prevents infill development in a residential zone and, in some cases, actually restricts future development in some large lot areas.
22. The NPS-UD further directs councils to enable a variety of homes that meet the needs in terms of type, price and location of different households (Pol 1).
23. The Section 42a report notes that "it is necessary to look at the capacity provided as a whole, rather than looking at changes to one zone in isolation"² but then states "PC19 proposes to amend the residential framework so that higher density is concentrated in the MRZ"³. Whilst I agree with the premise of providing a Medium Density Residential Zone (MDR) to enable increased housing capacity, I also consider the NPS-UD relates to the urban environment, and therefore all residential zones. By focusing all growth in the MDR zone, this begs the question as to how Policy 1 of the NPS – to enable a

¹ National Policy Statement on Urban Development 2020 (May 2022) Policy 1, and Policy 6(c)

² Paragraph 29, s42a report

³ Paragraph 163 of s42a report

variety of homes that meet the needs in terms of ***type, price and location of different households*** – is achieved?

24. Separate to the NPS-UD, the Vincent Spatial Plan states as the population continues to grow, demand increases for residential and lifestyle properties in areas as a driving change. The document also highlights the impact of smaller-sized lifestyle sections on productive land available. Drawing on this, it is essential to enable additional large lot development in areas already developed for residential use, so that productive land is protected.

Relief sought – Minimum Lot size for Large Lot Residential – Precinct 2 amended to 1,500m²

Density

25. Currently, the residential resource area allows for a residential density of 1 dwelling to every 250m² if in an area where sewer is available.
26. PC19 as proposed is an extremely restrictive rescheme when compared to the current plan.
27. Should an Applicant wish to build more than 2 units, they must now meet a density of 1 unit per 3,000m².
28. By so significantly decreasing the density enabled in some areas, the Plan Change unreasonably constrains private property rights and the ability of a landowner to reasonably subdivide, use and develop their land. As an example, many landowners have bought lots in the district and developed half the site with the intension of developing the other half at a later stage.
29. A higher density, coupled with the Comprehensive Development Rule (expanded on below) creates flexibility in the residential market to be able to provide varying dwelling typologies (this is in line with outcome sought by the NPS UD), and to respond to various site constraints such as large lots that are located in areas with relatively low amenity, or steep sites.

30. Growth via infill development should be future proofed now, not restricted. It is not sustainable, or an efficient use of land, to rely on greenfield development alone to provide for growth.

Relief sought – density standard LLRZ-S1 amended to 250m² as per the current plan.

Comprehensive Development / Multi- unit Development

31. The original submission requested re-instatement of the multi-unit development rule in line with the Operative District Plan. This enables many sites to be developed at the original density of one unit per 250m².
32. PC19 as proposed is therefore an extremely restrictive rescheme when compared to the current plan.
33. The Section 42a report states the multi-unit development rule remains in the plan as a restricted discretionary activity, should an Applicant wish to build more than 2 units. However, to remain RD they must meet a density of one unit per 3,000m². There are very limited large sites in Lowburn. Those that are remaining should be encouraged to provide a comprehensive design which should have an opportunity to produce a higher density if other factors are taken into account. With that in mind, in my opinion, I consider that the Comprehensive Residential Development Rule should be inserted into the Large Lot zone, across all precincts.
34. My understanding is that the comprehensive development pathway provides for greater flexibility, as this provides a restricted discretionary activity consent pathway, regardless of density. Given the existing enabled density of 250m² per unit in the Operative District Plan, I propose an additional standard in the rule requiring a 250m² density per unit.

Provisions

35. Of note, LLRZ-R1 (limiting number of units per site) is opposed. As an alternative I proposed the standard is amended to permit 2 units per at a density of 1 unit per 250m² (in line with the current district plan). For three or more units a Comprehensive Development Plan is required. The density provision shall be 250m².

36. I agree with the amendments proposed by the s42a report in relation to the provision of minor units per principal units and visitor accommodation.
37. See the table below for specific provision comments.
38. See the table in Appendix 1 for additional submission points and comments.

Relief sought: Delete LLRZ-R1 or amend to two units per site, density provision 250m².

PROPOSED AMENDMENTS

POLICY AND OBJECTIVES, RULES AND STANDARDS

LLRZ-OXX	Comprehensive Development	
Provide for comprehensively designed, large lot residential development on larger sites, at higher densities, where it:		
1. provides opportunities for a diversity of housing types choice;		
2. is designed to respond positively to its context and the features of the site;		
3. is compatible connected with the urban of to nearby centres and community facilities areas;		
4. provides a well-connected movement transport network and usable public open spaces and streetscapes; and		
5. maintains a high open space to built form ratio with large setbacks from adjoining sites and a clustered built form.		
LLRZ-PXX	Comprehensive Development	
Provide for comprehensively designed development on larger sites, at higher densities, where it:		
1. provides opportunities for a diversity of housing types;		
2. is designed to respond positively to its context and the features of the site;		
3. is connected to nearby centres and community facilities areas;		
4. provides a well-connected transport network and usable public open spaces and streetscapes; and		
5. achieves the built form outcomes in LLRZ.		
LLRZ-R1	Residential Units	
	Activity Status: PER	Matters of discretion are restricted to:
	Where:	a. How the development responds to its context and site

	<p>1. There are no more than <u>one two</u> residential units per site.</p> <p>And the activity complies with the following rule requirements:</p> <p><u>LLRZ-S1 to LLRZ-S6, except where the residential units are within an area for which a Comprehensive Residential Development Plan has been approved, and non-compliance with any rule requirement has been considered through that resource consent.</u></p>	<p><u>features, including any retained buildings, existing trees.</u></p> <p><u>b. The design of road frontages and frontages to public open spaces in relation to public safety (including CPTED principles), activation, entrance recognition, access and servicing.</u></p> <p><u>c. Management of privacy, views and sunlight access for neighbours, including those on-site.</u></p> <p><u>d. The location, safety and landscape treatment of shared access and parking areas, including garages.</u></p> <p><u>e. Configuration of building / roof forms, façade design and material use.</u></p> <p><u>f. The balance between hard and soft landscaping and the extent to which landscaping enhances residential amenity.</u></p> <p><u>g. The location, size and quality of private and common open spaces, including orientation, privacy, and access to internal areas.</u></p> <p><u>h. The location, useability and screening of service, storage and waste management areas.</u></p>
<u>LLRZ-RX</u>	<u>Comprehensive Residential Development</u>	
<u>Precinct 2</u>	<p><u>Activity Status: RDIS</u></p> <p><u>Matters of discretion are restricted to:</u></p> <p>a. <u>Provision for housing diversity and choice,</u></p> <p>b. <u>How the development responds to its context and site features, including solar orientation, views,</u></p>	

	<p><u>existing buildings and vegetation,</u></p> <p>c. <u>The location, extent and quality of open space and streetscapes, taking into account servicing and maintenance requirements.</u></p> <p>d. <u>The Incorporation of Crime Prevention Through Environmental Design (CPTED) principles to achieve a safe and secure environment.</u></p> <p>e. <u>Where the application also seeks provision for future built development to breach any of the rule requirements, discretion is also restricted to those matters specified in the relevant rule requirement.</u></p> <p>f. <u>Amenity effects on neighbouring properties and streetscape.</u></p> <p>g. <u>Provision for privacy between residential units and between sites</u></p>	
LLRZ-S1	Density	
Precinct 2	<p>The Minimum site area per residential unit is 3,000m² <u>per site. If a Comprehensive Residential Development Plan has been approved then the density as stipulated in that plan or to a minimum of 250m² per dwelling.</u></p>	
SUB-RX	<p>Subdivision of land where each allotment contains an existing principal residential unit, or where a land use consent has been obtained, or is applied for concurrently, under MRZ-R1, <u>LRZ</u>, and <u>LLRZ</u></p>	

SUB-S1	Minimum Allotment Size	Activity Status where compliance is not achieved:
Large Lot Residential Zone Precinct 2	7. The minimum Lot size shall be no less than 3000m² <u>1500m²</u>	NC

SUMMARY

39. Overall, This submitter, is generally disappointed by the recommendations that have been made in the section 42A report to the extent that submissions in my view have not been given due consideration and the appropriate higher order documents like the NPS-UD and the Regional Policy Statement have not been given appropriate regard. This has resulted in the provision for infill and comprehensively designed developments being omitted from the District Plan for the Lowburn area, as can currently be done under the Operative district Plan.



**Joanne Skuse
Senior Planner**

Attachments

Attachment 1: Table responding to comments from the Section 42A report

	Submission Point	Section 42a Response	Submitter response
1.	MRZ-O2, MRZ-P1 and MRZ-P2 should be amended to highlight amenity and character is anticipated to change over time	<p>Given MRZ-O2 and LRZ-O2 already refers to “anticipated” amenity values, and the submitter does not identify alternate wording to address their concern, I do not recommend a change in response to this submission point.</p> <p>“I consider it more appropriate to make a minor change to MRZ-O2.2 to acknowledge that it is expected that this zone will change over time (noting I do not consider the same applies to the LRZ).</p> <p><i>changes over time to provides a range of housing types, including those of a greater density than other residential zones, making efficient use of land and providing for growth needs</i></p>	This wording is supported by the NPS-UD. Requiring development to maintain the anticipated amenity values of adjacent sites isn’t enabling the character of the zone to change and become medium density.
2.	Seek reinstatement of previous multi-unit development rule	“A restricted discretionary rule is already provided within the PC19 package for multi-unit development (LLRZ-R1; LRZ-R1 and MRZ-R1)”	RD is provided but you have to comply with the standards which limits the density. We submitted to reinstate the rule with the 250m2 lot size. Breaching the new density provision makes this a non-complying activity. The density requirements still apply to all zones other than the Medium Density Rule. It is considered that the same approach that has been taken for the MRZ should be taken for all residential zone providing flexibility of

			form to achieve greater density. This is in line with the current district plan.
3.	MRZ-P7 - question how it will be determined when a further supply of residential land is required	<p>The land currently is not considered necessary to meet short-term demand, but are intended to supply medium-long term demand.</p> <p>servicing is not yet available, or planned.</p> <p>Inclusion in the FGO therefore allows infrastructure providers, including the Council, to start planning for servicing these areas.</p> <p>Do not agree that provision of infrastructure, and particularly wider network upgrades, is a matter that can be addressed through a structure plan.</p> <p>The question of when further supply is required will be determined through monitoring and updating of growth projections, which is a common approach.</p>	<p>The NPS-UD requires plan enabled development capacity for the medium term. Therefore, this zoning is required to be zoned in the Proposed Plan in terms of residential supply now.</p> <p>Infrastructure servicing will need to be worked through as part of this plan change.</p>
4.	MRZ-R1 should be amended to allow for up to three units	"I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form"	Accepted and this can be dealt with under the Comprehensive development rule.
5.	MRZ-R2 'Define Comprehensive Residential Development Master Plan'	can be addressed by amending the rule title and definition to just refer to 'Comprehensive Residential Development'.	Hasn't followed through into drafting of MRZ-R2
6.	Amend MRZ-R3 to provide for only one minor unit per principal rather than site	Rule amended: There is a maximum of one minor residential unit per principal residential unit on any site	Agree with approach
7.	MRZ-R7 – Amend rule to enable visitor accommodation activity in minor residential units as well as principal units. Amend to remove permitted standard 3.	<p>Agree with clarifying this in the rule to enable activity in minor units.</p> <p>Agree with removing the requirement for access to the site to not be shared with another site.</p>	Agree with approach

8.	Amend MRZ-R19 provide for hazards as a restricted discretionary activity	<p>“The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan... No review of these has been undertaken as part of PC19 and therefore there is no technical information to support changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed”</p>	<p>Don't agree with this approach. A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being addressed therefore restricted discretionary is appropriate.</p> <p>The response from the reporting planner highlights the issues with a partial plan review.</p> <p>In this instance there has been a submission relating to an overlay within the residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.</p>
9.	Amend MRZ-S1 to provide for a density of 150m2 rather than 200m2	<p>With respect to larger and comprehensively planned development, I note that the comprehensive development pathway provides for greater flexibility, as this provides a restricted discretionary activity consent pathway, regardless of density.</p> <p>Recommended to be retained on basis of urban design advice</p>	<p>Agree that density can fall away if comprehensive development is being undertaken. Note we have requested that the comprehensive development rule relate to the Low Density Residential Zone as well in this instance it may be appropriate to have a minimum density of 250m².</p>
10.	Amend MRZ-S4 to provide for 50% site coverage	<p>Feasibility testing has occurred in relation to the MRZ standards which were tested by urban designers as part of the PC19 drafting phase.</p>	<p>Has feasibility work been undertaken to confirm the built standards can be achieved? The matters of discretion put too much emphasis on open space</p>

		40% was recommended so as to provide for a more open and spacious feel within the Central Otago context, with their testing identifying that a 50% building coverage would provide for potentially large and continuous built forms that in their view, would likely be too urban. 40% retained	and space around buildings. This is an MDR zone, and the focus should be ensuring open space and amenity is derived from recreation reserves and other public amenity spaces. How can you be too urban in a MDR zone?
11.	Amend MRZ-S8 to decrease landscape permeability;	a 30% requirement provides for adequate provisions of both buffer and screen planting between buildings, fence lines, car parking and access ways with opportunities for more substantial landscape areas to support larger tree planting.	This can be worked through in an application under the comprehensive development rule.
12.	Remove MRZ-S10	Partially amended to remove “principal bedroom, 3m in depth and 3m in width” Based on urban design advice	How does this reconcile with a 1m yard setback? Question whether this has been tested.
13.	MRZ-S12 – Remove standard. Restricts potential housing typologies such as walk-up apartments	Amended to: <u>Any residential unit must have a habitable room located at ground floor level, unless the unit (excluding access to it) is located entirely above the ground floor level</u> Required for street activation	Disagree with approach. The MDR provisions should enable designs such as walk-up apartments, such typologies can still achieve street activation.
14.	MRZ-S13 - minimum car parking requirements have been removed for Tier 3 Councils	The NPS-UD is not considered to apply to the Central Otago District and therefore the requirements can be retained.	It is strongly recommended that this is looked at again please see the Section 32 Evaluation Report ¹ that the

¹ [section-32-report-v61.pdf \(orc.govt.nz\)](#), page 217

		In absence of any technical review, I do not consider it appropriate to amend the current standards.	ORC has done in relation to the Proposed Regional Policy Statement. It is considered that the CODC meet both limbs of the Urban Environment test.
15.	Medium Density Guidelines should be explicitly referred to in matters of discretion to provide weight	The reason it was not included was that its inclusion could limit the flexibility of design options and affect the ability of Council to update the Design Guide. Guidance is provided in the Design Guide as to how the matters in those rules will be considered, with the Design Guide outlining how the policy direction can be met. Either leave as is, or include as matter of discretion “any guideline published by Council”	Note that there may be procedural difficulties to documents that are incorporated by reference. As a rule of thumb any guideline should be incorporated by reference, or simply left as “any other matter” to be considered. A hybrid is confusing and inappropriate.
16.	Replace Low Density Zone with General Residential Zone	“LRZ consistent with Spatial Plans. This difference in the NP Standards descriptions appears to be that the LRZ is referred to as having buildings predominantly with a suburban scale, whereas the GRZ refers to a mix of building types. In my view, the appropriate zone to apply is the one that describes what is anticipated moving forwards, not simply a continuation of what has happened previously. In this regard, higher intensity development may exist in the LRZ, but under PC19 these are intended to be focused in the MRZ”	It is considered that General residential best suits the development pattern of the district. Central Otago does not contain any large cities with complex nuanced zoning. Therefore the residential zone sometimes needs to be able to accommodate many uses. An example of this is Barry Avenue between Quarry Court and Melmore Terrace. Also the block bounded by Molyneux Avenue, Erris Street, Ray Street and Blyth Street.
17.	Amend LRZ-O2 and LRZ-P1 to highlight amenity and character is anticipated to change over time	Given MRZ-O2 and LRZ-O2 already refers to “anticipated” amenity values, and the submitter does not identify alternate wording to address	See submission table with suggested objectives and policies that already occur in the Medium Density

		<p>their concern, I do not recommend a change in response to this submission point.</p> <p>"I consider it more appropriate to make a minor change to MRZ-O2.2 to acknowledge that it is expected that this zone will change over time (noting I do not consider the same applies to the LRZ).</p>	<p>Zone. This is the relief requested.</p>
18.	Amend LRZ-R1 to allow for up to three units per site as a permitted activity	<p>Amended to reduced number to one unit per site due to 'drafting error'</p> <p>"I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form"</p>	<p>Agreed but more than 1 residential dwelling will trigger consent. It is submitted that such a consent application would need to meet the density of 1 dwelling per 250m² as a restricted discretionary activity.</p>
19.	Amend LRZ-S2 to allow for one minor unit per principal unit rather than site	Amended as per submission point	Agreed
20.	Amend LRZ-R6 to enable visitor accommodation activity in minor residential units as well as principal units and remove permitted standard 3	Amended as per submission point	Agreed
21.	Amend LRZ-R18 to provide for building on sites subject to hazards as a restricted discretionary activity	<p>"The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan... No review of these has been undertaken as part of PC19 and therefore there is no technical information to support changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed"</p>	<p>A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being addressed therefore restricted discretionary is appropriate.</p> <p>The response from the reporting planner highlights the issues with a partial plan review.</p>

			In this instance there has been a submission relating to an overlay within the residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.
22.	LRZ-S1 – density - 'down zoned' as the existing plan allows for a 250m2	<p>While I accept that the current minimum will increase from 250m2 , I have been advised that despite this minimum having applied since around 1990, development has rarely occurred at this density....</p> <p>is likely to be the effect of other existing standards, particularly building setbacks and site coverage, means it would be difficult to site a complying dwelling on a smaller section. PC19 proposes to amend the residential framework so that higher density is concentrated in the MRZ.</p> <p>Densities are consistent with the modelling undertaken in the development of the Spatial Plan.</p> <p>PC19 zoning framework will not result in under-supply.</p> <p>Recommend reducing 500m2 to 400m2</p>	<p>Growth via infill development should be future proofed now, not restricted. It is not sustainable, or an efficient use of land, to rely on greenfield development alone to provide for growth.</p> <p>This is also factually incorrect refer to the infill development at 8A-8C Ray Street. Also to Wooing Tree, and Prospectors park where minimum lot sizes of 250m² have been taken up</p>
23.	Amend LRZ-S2 to a maximum height of 8m and include provision for chimneys beyond that	Maintain 7.5m; add exemption for chimneys; provide for broader consideration of reasons why a higher height might be appropriate in the matters of discretion	8 metres is standard for a 2 storey house.
24.	Amend LRZ-S5 to a setback of 3m	Reducing the front yard setback in the LRZ, while providing more flexibility for development, could result in a visually distinct contrast emerging between new	See NPS-UD Policy 6(b)(i) and (ii), this policy relates to amenity values that are anticipated and change. Specifically:

		development and older development. Reduced to 4.5m.	<p>that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:</p> <p>(i) may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and</p> <p>(ii) are not, of themselves, an adverse effect.</p> <p>This reasoning does not comply with Policy 6 of the NPS-UD. Therefore it is requested that the relief sought remain at 3m.</p>
25.	Delete LLRZ-R1 (limiting number of units per site)	I do not consider that the density standard on its own is sufficient to achieve the outcomes sought with respect to built form.	<p>Disagree considering the coverage and permeable surface area standards are percentages and therefore are relative to the size of lot. What effect is the one unit per site rule trying to mitigate or planning outcome to be achieved, when there is a density rule?</p> <p>A site could be subdivided to its minimum lot size and a house built on each unit and would achieve the same outcome as multiple units on one big site. Note a new subdivision rule has been accepted as part of the submissions that allows for subdivision as a</p>

			controlled activity if development is approved. Reduce to two units per site at density of 1 unit per 250m ² . Three or more units require a Comprehensive Development via newly inserted RDIS rule.
26.	Amend LLRZ-R2 to provide for one minor unit per principal unit	Amended as per submission point	Agreed
27.	Amend LLRZ-R6 to enable visitor accommodation in minor unit and principal unit and remove permitted standard 3	Amended as per submission point	Agreed
28.	Amend LLRZ-R10 to increase the volume of earthworks permitted	Accepted 200m ² (area) is inappropriate. I consider a 500m ³ volume to be too high, proposed 200m ³ . Added exemption for excavation required for construction of a building for which a building consent has been issued.	300m ³ is a more appropriate volume. It is inefficient to need to apply for consent when building dwellings just for earthworks. The QLDC Plan has a 300m ³ minimum volume.
29.	Amend LLRZ-R15 to provide for building on sites subject to hazards as a restricted discretionary activity	“The approach to managing built development in hazard areas, including activity status, reflects the Operative Plan... No review of these has been undertaken as part of PC19 and therefore there is no technical information to support changes to these.... the appropriate time to review the specific requirements is when the natural hazards matters are reviewed”	A Non-Complying activity status (operative district plan) is too broad when matters that relate to hazards can often be dealt with via engineering input and this input should be limited to the hazard being addressed therefore restricted discretionary is appropriate. The response from the reporting planner highlights the issues with a partial plan review. In this instance there has been a submission relating to an overlay within the

			residential chapter. Relief is sought and it is appropriate to do so now as this could potentially be missed in the future.
30.	LLRZ-S1 - Density – downzoning land and not enabling infill	<p>PC19 has attempted to rationalise the variation in densities, while recognising that in some areas, it is appropriate to retain the current densities to maintain existing amenity and character.</p> <p>I therefore do not consider it appropriate to amend the densities such that the number of variations increase further, particularly where the change sought does not relate to maintaining existing amenity and character. Therefore, while some of the minimum lot sizes proposed in PC19 are higher than the current minimum lot sizes applying, they are consistent with the current average and overall existing amenity and character. ‘additional’ infill development opportunities are not enabled. However, in my view this should be considered in the context of the overall package of zonings in PC19, which are anticipated to provide sufficient supply to meet projected demand.</p>	<p>Reference by focusing all supply in MDR not providing varied housing choice. There will be a need for larger lots.</p> <p>We submit that the demand will not only be for MDR lots. The housing market needs to cater for a broad range of housing typologies.</p>
31.	Amend LLRZ-S2 to provide for a maximum height of 8m	Maintain 7.5m; add exemption for chimneys; provide for broader consideration of reasons why a higher height might be appropriate in the matters of discretion	8m is a typical two storey height, and used in many other District plans eg. Gore District Plan; Queenstown Lakes District Plan
32.	LLRZ-S4 – Building Coverage – is this feasible/been tested	Based on urban design advice. Accept that the coverage will reduce from that currently	We have not seen this advice, has it been made public as part of the plan

		applying, I note that it is unusual for a zone of this type to have such a high site coverage.	change documentation that we could have overlooked?
33.	Submitter considers the Central Otago District to be a Tier 3 Council and accordingly National Policy Statement for Urban Development should apply	Central Otago had not been identified by MHUD as a local authority who was required to remove the car parking requirements see Appendix 2.	Appendix 2 does not say this. Appendix 2 puts the responsibility back on the TA to apply the definition of urban Environment. Appendix 2 states CODC was not 'checked to make sure' parking had been removed. It does not confirm that CODC therefore didn't need to remove them.