

## SUMMARY OF STATEMENT OF EVIDENCE OF JOANNE SKUSE FOR SUGARLOAF VINEYARDS LTD

This summary of evidence is in relation to the Plan Change 19 provisions. Plan Change 19, aims to introduce new regulations to control the development and growth in Central Otago's urban areas. The evidence reviewed and commented on the entirety of the Plan Change proposal to demonstrate the interest and dedication of the submitter's intention to seek the best outcome for the entirety of the District. Given the restricted time to present evidence the submitter has focused on the provisions of the Plan Change that relate to the zoning of the submitters land (but would also be applicable to other sites as well).

I agree with the elements of the plan change proposal but consider that the minimum lot size and density requirements that PC 19 has put forward will limit growth in the area.

I consider that the National Policy Statement on Urban Development (NPS-UD) applies to CODC and it requires the Council to provide enough housing to meet demand, and housing choice. The proposed regulations do not reflect this. I highlight the following Key Objectives which CODC is "strongly encouraged" to apply:

**Objective 1:** New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

**Objective 2:** Planning decisions improve housing affordability by supporting competitive land and development markets.

**Objective 4:** New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

The supporting policies require Council to provide capacity to meet demand the short term, medium term, and long term (Policy 2); to enable the density required to given demand in the relevant location (Policy 5(b)); and are strongly encouraged to enable a variety of homes, such as different typologies and forms, and in locations to meet the needs (including affordability) of the community (Policy 1).

### Minimum Lot Size

Specifically, I have given evidence that the proposed lot size of 3,000m<sup>2</sup> in the Large Lot Zone Precinct 2, does not reflect the varying requirements of different households that reside in the district. When looking at demand and development capacity, it should be recognised that the plan change will be in place for at least ten years (once it is operative which could be between 5-10 years from now), if not more, before any review takes place.

A common thread throughout the Section 32 report is to maintain amenity, with freezing (or in cases increasing) minimum lot sizes as the tool to achieve this. Not only is at odds with Objective 4, but by

removing the ability for infill development, will create a commodity out of the Lowburn area, likely exacerbating affordable housing.

Restricting future development in some large lot areas does not meet the requirements of the NPS-UD.

In my opinion, the Large Lot Zone Precinct 2 should allow smaller lots of at least 1,500m<sup>2</sup>, which would enable infill development providing sufficient development capacity, provide a variety of homes in different locations, and ensure a well-functioning urban environment.

Finally, I consider that the NPS-UD relates to all residential zones and not just the Medium Density Residential Zone. By focusing all growth in the MDR zone, the plan change does not meet the requirements of the NPS-UD of providing housing choice and supporting housing affordability. Instead, as I have stated, all residential zones should be considered for growth to ensure that the council meets the housing demand in the area.

### **Density and Comprehensive development**

The relief sought as part of this submission is to amend the density standard LLRZ-S1 to 250m<sup>2</sup> as per the ODP, enabling many sites to be developed at the original density of one unit per 250m<sup>2</sup>. The proposed PC19 scheme is seen as extremely restrictive compared to the current plan.

The Section 42a report indicates that the multi-unit development rule remains in the plan as a restricted discretionary activity, but to remain so, they must meet a density of one unit per 3,000m<sup>2</sup>. This is challenging, if at all feasible for limited large sites in Lowburn.

This submission proposes the insertion of the Comprehensive Residential Development Rule into the Large Lot zone, across all precincts, providing greater flexibility through a restricted discretionary activity consent pathway, regardless of density. This is in line with the existing enabled density of 250m<sup>2</sup> per unit in the Operative District Plan. The submission proposes an additional standard in the rule requiring a 250m<sup>2</sup> density per unit. This would encourage comprehensive, design-led development to achieve positive urban design and landscape outcomes, considering other factors such as open space and character, rather than a restrictive approach led by arbitrary boundary lines to achieve certain lot sizes.

### **Provisions**

The Large Lot Residential - Precinct 2 should allow minimum lots of 1,500m<sup>2</sup>.

Currently it is proposed that the Large Lot Residential - Precinct 2 will limit the number of units per site to 1 per 3000m<sup>2</sup>. As an alternative, I propose the standard is amended to permit 2 units per site at a density of 1500m<sup>2</sup>. For three or more units, a Comprehensive Residential Development consent is required. The density provision shall be 250m<sup>2</sup>.

I agree with the amendments proposed by the s42a report in relation to the provision of minor units per principal units and visitor accommodation.