

Form 5

Submission on Publicly Notified Proposal for Policy Statement or Plan, Change or Variation

Queenstown-Lakes District Council Proposed District Plan (Stage 2) Chapter 24 – Wakatipu Basin

Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

Address: Sent via email to: services@qldc.govt.nz

Name of Submitter: RCL Henley Downs Ltd

About the Submitter: RCL are the owners and developers of the residential subdivision Hanley's Farm. This is an approx. 1750 lot staged subdivision under construction within the Jacks Point Resort Zone.

Trade Competition: The submitter cannot gain an advantage in trade competition through this submission.

Submission: **See attached Appendix 1**

Relief Sought: RCL Henley Downs Ltd Limited seek the relief referred to in the attached or such further, more refined, additional, other or alternative relief that might give effect to this submission and/or better serve the overall objectives of the district plan and the purpose and principles of the Resource Management Act 1991.

Hearings: The submitter wishes to be heard in support of this submission.

Address for Service: RCL Henley Downs Ltd
C/- Hayley Mahon
John Edmonds + Associates Ltd
Email: hayley@jea.co.nz
Phone: 03 450 0009

Date: 23rd February 2018

Section	Relief sought	Comment
Changes to Section 6 - Landscapes	Ensure that the landscape categories and the associated assessment matters from proposed Section 6 are only applicable to the Rural Zone and Wakatipu basin Rural Amenity Zone (or other named zones of similar purpose), such that they do not apply to zones where providing for residential living is principle purpose.	The current variation proposes (at the end of the Open Space and Recreation Chapter) changes to Section 6 of the Proposed Plan. These changes affect how landscape categories and assessment matters would be applied across a wide range of zones. The effect of the changes is difficult to ascertain, but it is considered that these parts of the Plan should not be applicable to zones where providing for residential living is a principle purpose of the zone.
Section 25 - Earthworks	Make no changes to the Earthworks Chapter of the Operative District Plan except for those that would remove unnecessarily requirements for resource consent.	<p>The earthworks rules recently made operative by Plan Change 49 is operating effectively and efficiently and there is no good reason to modify these.</p> <p>Several proposed amendments are of concern, including:</p> <ul style="list-style-type: none"> - Rules restricting the movement of sediment beyond the site, which are almost impossible to comply with (dust and runoff naturally move sediment between sites even on undisturbed sites) – Rule 25.5.11 - Increased uncertainty as a result of removing the non-notification clauses for most earthworks activities – Rule 25.6 - Reduction of volume restrictions (which already serve no useful purpose) and introduction of restrictions on areas of earthworks – Rule 25.2 - New rules applying to roads

Clause	Requested Amendment (as stated or shown as track changes)	Comment
Whole Section 29	Delete reference to “public”	Differentiating between “public” and “private” is opposed. The provisions should apply equally to both public and private transport systems
Whole Section 29	Amend objectives and policies to clearly set out the District Plan’s position on parking provision.	The overall strategy for parking in the district is not provided in the District Plan. It is not clear whether the intention is to meet demand or whether other factors have informed the standards and other provisions. There are varying policies and objectives that do not always read consistently. It would be useful if this could be more clearly distilled from the objectives and policies.
New definition	Define “linear infrastructure”, or amend provisions that refer to this term (e.g. policy 29.2.3.3)	It is unclear what is meant by “linear infrastructure”.
All Restricted Discretionary activities in Section 29	Inclusion of “the benefits of the proposal” in the matters Council restricted its discretion	It is important that the merits of RD activities, which could be refused resource consent, should be considered to weigh against the other matters.
Policy 29.2.1.1	<p>Require that roading and the public transport and active transport networks are well-connected and specifically designed to:</p> <ul style="list-style-type: none"> a. enable an efficient public transport system; b. reduce travel distances and improve safety and convenience through discouraging single connection streets; and c. provide safe, attractive, and practical walking and cycling routes between and within residential areas, public facilities and amenities, and employment centres, and to existing and planned public transport. 	The transport network should be efficient, not just the public transport network.
Policy 29.2.1.2	Recognise the importance of expanded public water ferry services as a key part of the transport network and enable this by providing for park and ride, public transport facilities, and the operation of public water ferry services.	Emphasis on public may preclude private ventures from providing ferry services.

<p>Policy 29.2.1.3</p>	<p>Require high traffic generating activities and large scale commercial activities, educational facilities, and community activities to contribute to the development of well connected public and active transport networks and/ or infrastructure.</p>	<p>It is questioned whether the intention is to establish financial contributions on this matter and therefore whether the manner in which it is set out in the proposed plan is compliant with the Resource Management Act's requirements in this regard.</p> <p>The intention to require particular obligations for "high traffic generating activities" is opposed for several reasons.</p> <p>It is understood that the method QLDC employs for upgrades to the transport network off site is the levying of development contributions via the LGA. This is the most equitable and fair approach. It overcomes difficulties such as the arbitrary threshold for "high traffic generating activities", uncertainties as to what will be required and the practical limitations of being required to undertake works off site.</p> <p>The most notable time when new transport infrastructure is created by a developer is at the time of subdivision. It is considered that the proposed Subdivision section has sufficient provisions to set out the obligations of developers.</p>
<p>Policy 29.2.1.4</p>	<p>Provide a roading network within and at the edge of the Town Centre zones that supports these zones becoming safe, <u>multimodal</u> high quality pedestrian dominant places and enable the function of such roads to change over time.</p>	<p>The implication that all roads in and around town centres should be "pedestrian dominated" is problematic. Some roads will need to be multimodal.</p>

<p>Policy 29.2.2.1</p>	<p>Manage the number, location, type, and design of parking spaces, queuing space, access, and loading space in a manner that:</p> <ul style="list-style-type: none"> a. is safe and efficient for all transport modes and users, including those with restricted mobility, and particularly in relation to facilities such as hospitals, educational facilities, and day care facilities; b. is compatible with the classification of the road by: <ul style="list-style-type: none"> (i) ensuring that accesses and new intersections are appropriately located and designed and do not discourage walking and cycling; (ii) avoiding heavy vehicles reversing off or onto any roads; and (iii) ensuring that sufficient manoeuvring space, or an alternative solution such as a turntable or car stacker, is provided to avoid reversing on or off roads in situations where it will compromise the effective, efficient, and safe operation of roads. c. contributes to an increased uptake in public transport, cycling, and walking in locations where such alternative travel modes either exist; are identified on any Council active transport network plan or public transport network plan; or are proposed as part of the subdivision, use, or development; d. provides sufficient parking and loading spaces to meet the expected needs of specific landuse activities in order to minimise congestion and visual amenity effects, particularly in areas that are not well connected by public or active transport networks and are not identified on any Council active or public transport network plans; e. is compatible with the character and amenity of the surrounding environment, noting that exceptions to the design standards may be acceptable in special character areas and historic management areas; and f. avoids or mitigates adverse effects on the amenity of the streetscape and adjoining sites. 	<p>In terms of parking provision, it is not clear how providing parking to meet needs would “reduce congestion” (as stated in the policy) or contribute to Objective 29.2.2’s promotion of matters such as compact urban growth, increasing walking and cycling and urban design.</p> <p>This leads to a broader question as to the overall strategy for parking in the District Plan. It is not clear whether the intention is to meet demand or whether other factors have informed the standards and other provisions. There are varying policies and objectives that do not always read consistently. It would be useful if this could be more clearly distilled from the objectives and policies.</p>
------------------------	---	--

Policy 29.2.2.3	<p>Enable a lower rate of accessory parking to be provided for residential flats district wide, and for residential activity in the Town Centre, Business Mixed Use, High Density Residential, and Medium Density Residential zones compared to other zones to support intensification and in recognition of the accessibility and anticipated density of these zones.</p>	<p>The intention is supported to the extent that this policy supports a “lower amount of accessory parking” for some areas and land uses. It is questioned why the same cannot be extend to other areas and all land uses.</p> <p>It is considered best to delete the policy and replace this and other policies to more clearly set out the Plan’s position on parking provision.</p>
Policy 29.2.2.5	<p>Enable a reduction in the number of car parking spaces required only where:</p> <ol style="list-style-type: none"> the function of the surrounding transport network and amenity of the surrounding environment will not be adversely affected; and/ or there is good accessibility by active and public transport and the activity is designed to encourage public and active transport use; and/ or the characteristics of the activity or the site justify less parking. 	<p>There is a concern around reference to allowing lower levels of parking “only where....the surrounding environment will be adversely affected”. This discourages flexibility to consider cases where effects would be minor.</p> <p>If rigid application of rules is to apply in this matter, it is argued that this would not be consistent with the multiple outcomes sought in objective 29.2.2. and 29.2.4.</p> <p>Amend the policy to allow flexibility in appropriate circumstances (such as where effects would be minor)</p>
Policy 29.2.2.12	<p>Mitigate the effects on safety and efficiency arising from the location, number, width, and design of vehicle crossings and accesses, particularly in close proximity to intersections and adjoining the State Highway, while not unreasonably preventing development and intensification <u>or promoting poor amenity outcomes.</u></p>	<p>The policy is supported, particularly the acknowledgement that access distances from intersection may not always be practical to enforce. It would be useful to add “or promoting poor amenity outcomes”.</p>
Policy 29.2.3.1	<p>Require, as a minimum, that roads <u>Encourage roads to</u> be designed in accordance with Section 3 and Appendices E and F of the QLDC Land Development and Subdivision Code of Practice (2015).</p>	<p>The standards in the code of practice are not always practical in all contexts. The authors of that standard would appear to have anticipated such flexibility. It would be more appropriate to state “encourage” than “require”.</p>

Policy 29.2.3.6	Provide for public amenities within the road in recognition that the road provides an important and valuable public open space for the community which, when well designed, encourages human interaction and enriches the social and cultural wellbeing of the community.	What is meant by “public amenities” that is not otherwise covered by other policies? There is uncertainty as to whether this policy might be used to require developers to contribute facilities? The policy is considered unnecessary.
Policy 29.2.4.1	Avoid <u>Manage</u> commercial activities and home occupations in residential areas that result in cars being parked either on-site or on roads in a manner or at a scale that will adversely affect residential amenity or the safety or the transport network. This includes the storage of business-related vehicles and rental vehicles and other vehicles being parked on streets adjoining the residential zones when not in use.	The reference to “streets adjoining the residential zones when not in use” is not clear. Often streets form the boundary between zones. Is it intended that parking on the side of a street without residential zoning should be affected. If this is the intent, it is opposed. Delete policy or delete “avoid” and replace with “manage”

<p>Policy 29.2.4.4</p>	<p>Avoid or mitigate the adverse effects of high trip-generating activities on the transport network by assessing the location, design, and the methods proposed to limit increased traffic generation and promote the uptake of public and active transport, including by:</p> <ul style="list-style-type: none"> a. demonstrating how they will help reduce private car travel and encourage people to walk, cycle, or travel by public transport, including by: b. preparing travel plans containing travel demand management techniques and considering lower rates of accessory parking; c. contributing toward well-connected public and active transport infrastructure or, where planning for such infrastructure is not sufficiently advanced, providing space for such infrastructure to be installed in the future; d. providing public transport stops located and spaced in order to provide safe and efficient access to pedestrians who are likely to use each stop; and e. providing less accessory parking than is required by Table 29.5 in conjunction with proposing other initiatives to encourage alternative modes of travel. <p><u>Allow lower levels of accessory parking set out in Table 29.5 where demand can be shown to be lower and / or where initiatives to encourage alternative methods of travel are proposed.</u></p>	<p>It is questioned whether the intention is to establish financial contributions on this matter. If so it is further questioned whether the method in which it is set out in the proposed plan is compliant with the Resource Management Act’s requirements in this regard.</p> <p>The intention to require particular obligations for “high traffic generating activities” is opposed for several reasons.</p> <p>It is understood that the method QLDC employs for upgrades to the transport network off site is the levying of development contributions via the LGA. This is the most equitable and fair approach. It overcomes difficulties such as the arbitrary definition of “high traffic generating activities”, uncertainties as to what will be required and the practical limitations of being required to undertake works off site.</p> <p>The most notable time when new transport infrastructure is created by a developer is at the time of subdivision. It is considered that the proposed Subdivision section has sufficient provisions to set out the obligations of developers.</p> <p>Furthermore, Point e is potentially inconsistent with other policies that suggest that demand for parking should be met. The Plan should be more clear on this matter. That said, the intention here is supported and could be sole focus of this policy. It is suggested that the policy could be replaced with something like that in the “relief sought”. This would provide a role for the implementation of travel plans in certain circumstances.</p> <p>Delete policy and replace with policy as proposed.</p>
------------------------	---	--

Policy 29.2.4.5	Encourage compact urban growth through reduced parking requirements in the most accessible parts of the District.	This policy is supported, although it is considered that there are more accessible parts of the District where lower parking requirements could apply.
Rule 29.3.3.1	<p>Any land vested in the Council or the Crown as road, shall be deemed to be a “road” from the date of vesting or dedication in and subject to all the provisions that apply to roads, as outlined in Table 29.2 and Table 29.4; and</p> <ul style="list-style-type: none"> a. Any zoning, including subzones, ceases to have effect from the time the land is vested or dedicated as road; and b. Any provisions relating to overlays such as the Special Character Area, Outstanding Natural Landscape, Outstanding Natural Feature, Rural Landscape, Significant Natural Area, Protected Trees, and listed heritage buildings, structures, and features continue to have effect from the time the land is vested or dedicated as road. 	29.3.3.1b This rule needs more clarity, with a specific list of overlays which apply (as opposed to “such as.”).

Clause	Requested Amendment		Comment
Rule 29.4.9	<p>Rental vehicle businesses in all zones where commercial activities are permitted</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on the safety and efficiency of the transport network, resulting from rental vehicles being parked on roads and other public land when not in use. • Effects on amenity from rental vehicles being parked on roads and other public land when not in use. <p>The amount, location, and management of the vehicle parking/ storage proposed, including the location, accessibility, and legal agreements where parking is not proposed on the same site as the office and reception area.</p>	RD	<p>This rule relating to rental car parking is unclear. It would seem best to sit in the chapter for each Zone. The rule seems to imply that rental car parking is permitted where residential is permitted. Is this the case?</p> <p>Clarify and amend if needed.</p>

<p>Rule 29.4.10</p>	<p>High Traffic Generating Activities</p> <p>Any landuse or subdivision activity that exceeds the traffic generation standards set out in Table 29.6</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on the transport network, including as a result of: <ul style="list-style-type: none"> any proposed travel planning, provision of alternatives to private vehicle, or staging of development; any proposed improvements to the local transport network within or beyond the site, including proposed additions or improvements to the active and public transport network and infrastructure and the roads themselves, in accordance with Council standards and adopted infrastructure network development plans either within or beyond the site. This may be required by direct construction activities, or by collecting funds towards a wider project that would achieve the modal shift aim of the specific development, as promoted in the application; the amount, design, and location of cycle parking, e bicycle charging areas, showers, changing rooms and lockers provided; the amount of accessory parking and any non-accessory parking proposed; and the design of the site and/ or its frontage in regard to its ability to accommodate any proposed public transport infrastructure proposed by Council; the provision or upgrading of pedestrian and cycle infrastructure; and the provision of a Travel Demand Management Plan. 	<p>RD</p>	<p>Refer prior comments in regard to Policy 29.2.4.4 and Policy 29.2.1.3.</p> <p>Delete rule</p>
---------------------	---	-----------	--

<p>Rule 29.4.16</p>	<p>Construction of any unformed road into a formed road.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • The safety and functionality of the road design, including the safety of intersections with existing roads. • Ongoing maintenance costs of the road design. • Effects on the environment and/ or character of the surrounding area (including effects from dust, noise and vibration and effects on visual amenity). • Effects on the ability to continue to provide safe access for other current and potential users of the unformed legal road, including pedestrians and cyclists. 	<p>RD</p>	<p>What is meant by “forming” is unclear. Would this include forming a trail? Regardless this new requirement would be significant and casts doubt on whether future transport routes protected by “paper roads” could ever be formed.</p> <p>Delete (or at least reduce status to controlled activity)</p>
<p>Rule 29.4.17</p>	<p>Any veranda, balcony, or floor area of a building overhanging a road, where the building is controlled in the adjoining zone.</p> <p>For the purpose of this rule, where the road adjoins two different zones, the provisions of the adjoining zone only apply up to the centreline of the road in that location.</p> <p>Control is restricted to those matters listed for buildings in the adjoining zone and the effects on traffic safety and effects on the kerbside movement of high-sided vehicles.</p>	<p>€</p>	<p>It would be more appropriate for the veranda etc overhang rules sat in the respective relevant zone chapters.</p>

Rule 29.4.18	<p>Any veranda, balcony, or floor area of a building overhanging a road, where the building is a restricted discretionary activity in the adjoining zone.</p> <p>For the purpose of this rule, where the road adjoins two different zones, the provisions of the adjoining zone only apply up to the centreline of the road in that location.</p> <p>Discretion is restricted to those matters listed for buildings in the adjoining zone and the effects on traffic safety and effects on the kerbside movement of high-sided vehicles.</p>	RD	It would be more appropriate for the veranda etc overhang rules sat in the respective relevant zone chapters.
--------------	---	----	---

Table 29.5	Table 29.xxxxxx - Standards for activities outside roads	Non compliance status	
	PARKING AND LOADING		
Rule 29.5.1	<p>Accessory parking</p> <p>The number of parking spaces (other than cycle parking) shall be provided in accordance with the minimum parking requirements specified in Table 29.5.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • <u>The benefits of the proposal</u> • <u>The effect of a shortfall</u> • The number of parking spaces provided. • The allocation of parks to staff/ guests and residents/ visitors. 	RD	Logically, it would seem that an additional matter of discretion should be “the effect of a shortfall”. Benefits need to be duly considered.
Rule 29.5.2	<p>Location and Availability of Parking Spaces</p> <ol style="list-style-type: none"> a. Any parking space required by Table 29.5 or loading space shall be available for staff and visitors during the hours of operation and any staff parking required by this rule shall be marked as such. b. No parking space required by Table 29.5 shall be located on any access or outdoor living space required by the District Plan, such that each parking space required by Table 29.5 shall have unobstructed vehicular access to a road or service lane. c. Parking spaces and loading spaces may be served by a common manoeuvring area (which may include the installation of vehicle turntables), which shall remain unobstructed. d. Residential units and visitor accommodation units may provide some or all 	RD	Rule 29.5.2b needs clarification. By definition access and outdoor living spaces usually mean they cannot double as parking spaces. If the intention is to limit tandem parking, this is opposed. It is important not to contradict rule 29.5.8 in that tandem parking on residential sites is reasonable and important for the efficient use of small sites. Tandem of staff parking behind visitor parking is also a reasonable approach on

	<p>of parking spaces required by Table 29.5 off-site (on a different site to that which the landuse activity is located on), in accordance with the following:</p> <ul style="list-style-type: none"> (i) If development in any High Density Residential Zone, Medium Density Residential Zone, or Business Mixed Use Zone is located within 800m of an established public transport facility or a public transport facility identified on any Council Active Transport Network Plan, then some or all of the car parking required may be provided off-site. (ii) Some or all of the coach parking required by Table 29.5 may be provided off-site. (iii) All other residential activity and visitor accommodation activity may provide up to one-third of the parking spaces required by Table 29.5 off-site. (iv) Off-site parking spaces in relation to the above must be: <ul style="list-style-type: none"> i. Dedicated to the units or rooms within the development; and ii. Located so that all the “off-site” car parking spaces allocated to the development are within an 800m walking distance of the boundary of the development. This does not apply to coach parking; iii. Not located on a private road or public road; and iv. Secured by a legally binding agreement attached to the relevant land titles that guarantees the continued availability of the parking for the units the off-site parking is intended to serve. <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • The long term availability of parking spaces for staff and visitors. • The location of parking spaces and manoeuvring areas within a site. • The proportion of spaces proposed off-site in zones other than the High Density Residential Zone, Medium Density Residential Zone, or Business Mixed Use Zone. • The location, accessibility, and legal agreements proposed. 		<p>non-residential zones.</p> <p>Clarify rule and make it clear that tandem parking does not require consent on residential sites and in certain circumstances on other sites.</p>
--	--	--	--

Rule 29.5.5

Mobility Parking spaces

~~a. Other than in relation to residential units and visitor accommodation with less than 6 guests, wherever an activity requires parking to be provided, mobility parking spaces shall be provided in accordance with the following minimum standards:~~

Total number of parks to be provided by the activity or activities on the site	Minimum number of mobility parking spaces required
1 to 10 spaces:	1 space
11 to 100 spaces:	2 spaces plus one more for every additional 50 parking spaces provided.

~~b. Mobility parking spaces shall be:~~

- ~~(i) on a level surface;~~
- ~~(ii) clearly signposted;~~
- ~~(iii) located on the same site as the activity;~~
- ~~(iv) be as close as practicable to the building entrance; and~~
- ~~(v) be accessible to the building via routes that give direct access from the car park to the building.~~

~~Discretion is restricted to:~~

- ~~• The number, location, and design of mobility parking spaces, including the accessibility of the spaces to the building(s).~~
- ~~• Effectiveness of the associated signage.~~

RD

This rule is unnecessarily arduous, particularly if only one park is required. Does this need to be marked as a mobility park and does this mean other users cannot use the sole park? It is understood that the building act also has requirements for disabled parking and it is questioned why QLDC should in anyway have differing requirements. If this is the case, the rule can be deleted.

Rule 29.5.6

Drop off/ pick up (set down) areas in all zones except in the Queenstown Town Centre Zone, the Wanaka Town Centre Zone, and the Arrowtown Town Centre Zone

a. All day care facilities, educational facilities, and healthcare facilities must provide drop off/ pick up (set down) areas to allow vehicles to drop off and pick up children, students, elderly persons, or patients in accordance with the following standards:

(i) A day care facility designed to cater for six or more children/ persons	1 drop-off/ pick up car space per 5 persons that the facility is designed to cater for (excluding staff).
(ii) A primary or intermediate school	1 drop-off/ pick up space per 50 students that the school is designed to cater for and 1 bus space per 200 students where school bus services are provided.
(iii) A secondary school	1 drop-off/ pick up space per 100 students that the school is designed to cater for and 1 bus space per 200 students where school bus services are provided
(iv) A health care facility or hospital	1 drop-off/ pick up space per 10 professional staff

b. In calculating the total number of drop-off/ pick up car spaces required, where the required amount results in a fraction of a space less than 0.5 it shall be disregarded and where the fraction is 0.05 or higher, then the requirement shall be rounded up to the next highest whole number and where there are two activities on one site (such as healthcare and day care) the total required shall be combined prior to rounding.

Discretion is restricted to:

- Effects on safety, efficiency, and amenity of the site and of the transport

RD

“0.05” seems to be a typographical error – its is presumed to mean “0.5”
Correct assumed error.

	network, including the pedestrian and cycling environment.		
Rule 29.5.8	<p>Residential Parking Space Design</p> <p>a. The minimum width of the entrance to a single garage shall be no less than 2.4 m.</p> <p>b. The minimum length of a garage shall be 5.5m.</p> <p>c. Where a car space is proposed between a garage door and the road boundary, the minimum length of this car space shall be 5.5m.</p> <p>d. Where onsite manoeuvring is required, the minimum manoeuvring area between the road boundary and the garage entrance shall be designed to accommodate a B85 design vehicle.</p> <p>e. Where two parking spaces are provided for on a site containing only a single residential unit or single visitor accommodation unit, the two parking spaces may be provided in tandem.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • The design of residential parking spaces. • Effects on safety, efficiency, and amenity of the site and of the transport network, including the pedestrian and cycling environment. 	RD	<p>Regarding rule 29.5.8c – if the 5.5m measurement of a parking space is required (given that there are standards for parking dimensions in the appendices) it should be measured from the footpath, as the overhang of cars over the footpath would appear to be the main issue. QLDC normally requires footpaths to be set at least 0.4m from the property boundary so that should be accounted for. It should be noted that parking within a road reserve is an appropriate use.</p> <p>Delete or amend rule to refer to the distance from the footpath.</p>
Rule 29.5.12	<p>Lighting of parking areas</p> <p>a. Excluding parking areas accessory to residential activity, where a parking area provides for 10 or more parking spaces, which are likely to be used during the hours of darkness, the parking and manoeuvring areas and associated pedestrian routes shall be adequately lit.</p> <p>b. Such lighting shall be designed in accordance with the Queenstown Lakes District Council Southern Light Part One - A Lighting Strategy (March 2017)</p>	RD	<p>RE 19.5.12c - This rule is difficult to comprehend (being a very long and complex sentence). Amend wording to ensure it is more easily read</p>

	<p>and Queenstown Lakes District Council Southern Light Part Two – Technical Specifications (March 2017).</p> <p>c. Such lighting shall not result in a greater than 10 lux spill (horizontal or vertical) of light onto any adjoining site within the Business Mixed Use Zone, the Town Centre zones, and the Local Shopping Centre Zone, measured at any point inside the boundary of any adjoining site or greater than 3 lux spill (horizontal or vertical) of light onto any adjoining site that is zoned High Density Residential, Medium Density Residential, or Low Density Residential measured at any point more than 2m inside the boundary of the adjoining site.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on the safety and amenity of pedestrian, cyclists, and motorists using the parking area. • Effects from the lighting on adjoining sites. 		
Rule 29.5.13	<p>Bicycle parking and the provision of lockers and showers</p> <p>Bicycle parking, e-bicycle charging areas, lockers, and showers shall be provided in accordance with the minimum requirements specified in Table 29.7 and the layout of short term bicycle parking shall be in accordance with Diagram 5 (bicycle layouts) of Schedule 29.2.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • The amount, location, and design of the cycle parks, charging areas, lockers, and showers proposed. • Effects on the mode share of those walking and cycling to and from the location. 	RD	<p>E-bicycles are an interesting but new technology. There is at this stage very limited uptake. It is unclear if they will become a significant transport mode. It is also unclear why an employer / building owner should have to provide such stations. Can these not be charged at home or at a charging station? Charging stations would therefore be unreasonably arduous.</p> <p>Delete reference to e-bicycles in rule 29.5.13 and Table 29.7</p>

	ACCESS				
Rule 29.5.14	<p>.....</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on safety, efficiency, and amenity of the site and of the transport network, including the pedestrian and cycling environment. • The design of the access, including the width of the formed and legal width. • The on-going management and maintenance of the access. • The vesting of the access in Council • <u>The practicality of constructing to the standards given matters such as site constraints.</u> 	RD	It is important to allow for the consideration of the practicalities of meeting the Code of Practice and other standards. For example, many parts of the District are steep or otherwise constrained, and meeting the standard may not always be practical or necessary in some circumstances.		
Rule 29.5.22	<p>Minimum distances of Vehicle Crossings from Intersections</p> <p>a. No part of any vehicle crossing shall be located closer to the intersection of any roads than the following minimum distances permitted below and as shown in Diagram 12 of Schedule 29.2:</p> <p>b. Roads with a speed limit of less than 70 km/hr:</p> <table border="1" data-bbox="510 1299 1227 1375"> <tr> <td>Frontage Road</td> <td>Minimum Distance (m) from intersecting road</td> </tr> </table>	Frontage Road	Minimum Distance (m) from intersecting road	RD	It is questioned whether the minimum site distances rule is necessary. Such rules can be contrary to good urban design. For example, in residential areas the access location furthest from an intersection is often not ideal for the site, leading to poorly located and configured
Frontage Road	Minimum Distance (m) from intersecting road				

Arterial	40
Collector	30
Local	25

c. Roads with a speed limit equal to or greater than 70 km/hr:

Frontage Road	Minimum Distance (m) from intersecting road
Arterial	100
Collector	60
Local	50

d. Except that where the boundaries of the site do not enable a conforming vehicle crossing to be provided, a single vehicle crossing may be constructed provided it is located 0.5m from the internal boundary of the site in the position that most closely complies with the above provisions.

Discretion is restricted to:

- Effects on the efficiency of landuse and the safety and efficiency of the transport network, including the pedestrian and cycling environment.

Advice notes:

1. Distances shall be measured parallel to the centre line of the carriageway of the frontage road from the centre line of the intersecting road. Where the roadway is median divided the edge of the dividing strip nearest to the vehicle crossing shall for the purposes of this control be deemed the centre line.
2. This Rule does not apply to State highways which are, instead, subject to Rule 29.5.23.

private open space. It is suggested that there should be discretion as part of the subdivision process to consider this. Once sites are formed QLDC have discretion over allowing new accesses to the network. At a minimum the rule needs discretion added for “urban design and usability of resultant sites”

Table 29.xx	Rules – Standards for activities within roads		
Rule 29.6.1	<p>Transport infrastructure</p> <p>All transport infrastructure listed as permitted within a formed road shall comply with the following standards:</p> <p>a. Temporary works, buildings and structures must be removed from the road on completion of works.</p> <p>b. After completion of works, the ground must be reinstated to at least the condition existing prior to any work starting.</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on the safety and efficiency of the transport network. 	RD	<p>This rule is unnecessary – the roading authority should have the power to remove unauthorised structures and ensure works are completed.</p> <p>Delete</p>
Rule 29.6.2	<p>Buildings</p> <p>Public transport facilities and public toilets that meet the definition of a building shall comply with the following standards of the zone adjoining the road:</p> <ul style="list-style-type: none"> (i) building height, (ii) building height to boundary, and (iii) recession planes <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> • Effects on the amenity of neighbouring sites. <p>Advice note:</p> <p>Where there are two different zones adjoining either side of the road, the adjacent zone extends to the centre line of the former road.</p>	RD	<p>It is questioned whether these rules are needed as it would appear that there is plenty of ability of roading authority to control these. It should be noted b. and c. are the same thing.</p> <p>Delete or amend to address duplication</p>

Clause	Requested Amendment	Comment
29.8 – Assessment Matters	Assessment Matters [Delete entire section 29.8]	Assessment matters have to date been avoided in draft chapters and resisted in hearing reports. It seems anomalous to introduce them here and adds unnecessarily to the length of the plan.

Clause	Requested Amendment	Comment
Table 29	<p>Minimum Parking Requirements</p> <p>[make changes to address comments]</p>	<p>Overall, the submitter supports reductions in parking from what was required on Operative District Plan but opposes increases. This is on the basis that better urban design outcomes, efficient use of land and incentivising of transport modes aside from cars are to be encouraged.</p> <p>Specifically, the standards are supported except:</p> <ul style="list-style-type: none"> • The requirement for residential flats to have an on-site car park. Removing this will have affordability benefits in enabling more flats to occur and will prevent poor urban design outcomes (for example on smaller sites with narrow frontages the additional park is often in front of the façade of house in an area that would otherwise be garden). In practice, secondary tenants are likely to park on the street anyway. • Commercial: the overlap in definition with office should be clarified – it would helpful to add “other than office” • Oppose increases in parking from the Operative District Plan for some forms of visitor accommodation in some locations (for example in the Low Density Residential Zone). It is questioned whether there is any evidence base to support these as VA often has lower requirements to comparable scale of residential development. • Oppose requirements for on-site coach parking in urban areas. One of the major impediments to developing many hotel sites is the requirement for on-site coach parking. A

Clause	Requested Amendment	Comment
		<p>medium size hotel can require 5 or more coach sites. This uses a lot of land and is on many sites (particularly sloping sites) difficult or impossible to achieve. Where it can be achieved it often adversely affects the design. The emphasis should be on ensuring that loading of buses can occur safely and efficiently. On many sites this would mean ensuring there is an appropriate loading area on site, although there should also be provision for loading within the reasonable vicinity of a site. Coach parking should be able to occur off-site. It can be provided by the private sector or if required QLDC could provide such facilities.</p>

29.9.38 – Advice Notes	The following advice notes apply to all provisions relating to minimum car parking requirements:	
29.9.38.1	<p>In calculating the total parking requirement:</p> <ul style="list-style-type: none"> a. the requirement for residents/ visitors and the requirement for guests/ staff shall be added together (including fractional spaces), then rounded up or down in accordance with 29.9.38.1(c) below. b. where a development comprises more than one activity, the parking requirements for all activities shall be added together (including fractional spaces), and then then rounded up or down in accordance with 29.9.38.1(c) below. c. where the total parking requirement (as outlined in (a) and (b) above) for the development includes a fraction less than 0.5 it shall be disregarded and where it includes a fraction equal to or greater than 0.5, the parking requirement shall be rounded up to the next highest whole number, except that where the total carpark requirement is a fraction less than 1.0 (e.g. in the case of a single dwelling in the High Density Residential zone) then this shall be rounded up to 1.0. d. The area of any parking space(s) and vehicular access, drives, and aisles provided within a building shall be excluded from the assessment of gross floor area of that building for the purpose of ascertaining the total number of parking spaces required or permitted. e. Where the parking requirement is based on the number of bedrooms within a residential or visitor accommodation unit, any room with a window and which is able to be shut off from any living room or communal part of the unit shall be deemed to be a bedroom, regardless of whether it is identified as such on the building plans. 	<p>RE 29.9.38.1d - Exclusions from measurement of GFA should also include lobbies, circulations spaces etc as these spaces should not generate parking demand. (such rules can create perverse design incentives)</p> <p>Amendments as requested.</p>

