

B and A Stokes – Gressons Road, Waikuku

Submission on Variation 1: Housing Intensification

ATTACHMENT A

The specific provisions of the proposal that our submission relates to are as follows;

1. The zoning of the subject property at Waikuku and related plan objectives, policies and development control standards, to enable it to be developed for housing. The submitter has lodged a submission on the Proposed District Plan, dated 24 November 2021, seeking a change of zoning to General or Medium Density Residential. Proposed Variation 1 will merge the residential zones of the District Plan into the Medium Density Residential Zone, and this submission is to ensure consistency between the zoning of the subject property and the variation objectives and the adjoining residential zoning at Ravenswood. It also supports a more appropriate provision for medium density housing for Woodend/Ravenswood than that provided for by Variation 1. This submission should be regarded as supporting the submitters PDP submission and in addition to it.
2. Our submission is that the proposed Medium Density Residential Zone should apply to those parts of the Woodend/Ravenswood/Waikuku area that are suitable for medium density housing development, being located within walking distance or 800 metres from the commercial centre, and should not apply to the balance of the residential area which is further away from the town centre. The General Residential Zone should be retained for the balance of the residential area including part of the submitter's land. It is further submitted that the Council should identify the parts of the Woodend/Ravenswood/Waikuku residential area to remain as General Residential Zone as subject to a "Special Qualifying Matter" under s77 I(j) of the Amendment Act. The matters that make higher density, as provided for by the MDRS or Policy 3, inappropriate in those areas are:
 - A blanket approach to medium density housing is unsuitable in a town such as Ravenswood/Woodend which has developed in recent decades as a generally low density suburban environment with high standards of residential amenity and urban design. Medium density housing can and should be clustered in pedestrian proximity to the Commercial centre and public transport routes.
 - Variation 1 as notified will fail to provide for the required objectives and policies;

Objective 1

- (a) *a well-functioning urban environment that enables all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future:*

- (b) *a relevant residential zone provides for a variety of housing types and sizes that respond to;*
- (i) *housing needs and demand; and*
- (ii) *the neighbourhood's planned urban built character, including 3-storey buildings.*

Policy 1

- (a) *enable a variety of housing types with a mix of densities within the zone, including 3-storey attached and detached dwellings, and low-rise apartments*

Policy 3

- (c) *encourage development to achieve attractive and safe streets and public open spaces, including by providing for passive surveillance.*

Policy 4

- (d) *enable housing to be designed to meet the day-to-day needs of residents.*

- It is also inconsistent with the overall provisions of the Resource Management Act, and beyond the needs of the NPS-UD. The submitter understands that the Council has been advised that it has no choice in this matter; that MDRS standards must be applied to all urban residential zones and that special qualifying matters cannot be used to protect low density suburbs from the adverse effects of inconsistent high density housing. If that proves to be the case, and Variation 1 proceeds in its notified form, the submitter requests that its property be included within the scope of Variation 1 as though it was already zoned General Residential. That is, for the purpose of this process the property be treated as through its PDP submission has been allowed in full.

3. We seek the following decision;

EITHER: That the PDP submission be allowed in full and the property be included in the General Residential zone, along with adjacent residential areas of Ravenswood/Woodend/Waikuku, if Variation 1 has been appropriately modified to enable that outcome.

OR: That the area zoning of the property identified for General Residential be changed to Medium Density Residential Zone if Variation 1 proceeds in approximately its notified form.

In order to understand the position of the land some of the matters addressed in the submission on the WDC District Plan Review seeking rezoning of the land are attached for information.

Attachments:

Attachment A	Submission – Variation No 1
Attachment B	Background
Attachment C	Infrastructure
Attachment D	Zoning and Outline Development Plan
Attachment E	Market Report
Attachment F	Landscape/Urban Design Assessment