

From: Andrew Hocken
Sent: Wed, 23 Nov 2022 02:34:12 +0000
To: District Plan
Subject: Plan Change 21 Submission
Attachments: Benmore Place Master Plan 30 June 2022 Circulation.pdf, Benmore Place Master Plan 30 June 2022.pdf, Submission on Proposed Plan Change 21.pdf

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Good afternoon

Please find attached our submission. There are x 3 PDF's, one containing the actual submission and x 2 containing concept plans.

Many thanks and regards.

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Submission on Proposed Plan Change 21 to the Mackenzie District Plan.

Submitter: Mackenzie Properties Ltd

Contact: Andrew Hocken

1. The specific provisions of the Proposal our submission relates to are:

- (a) Medium Density Residential Zone. Support in part and object in part.
- (b) Low Density Residential Zone. Support in general with suggested amendments.
- (c) Large Lot Residential Zone. Support in general with suggested amendments.
- (d) Town Centre Zone. Support in part.
- (e) Large Format Retail Zone. Support in part and object in part.

2. Our submission is:

- (a) Medium Density Residential Zone. In general, we support the proposed plan change in respect of this new proposed zone. There is a need to encourage more intensive living in and around the existing town centre so that residents can walk or bike to the town centre and therefore become less reliant on other forms of transport use eg: cars. Maintaining existing walkways and footpaths is crucial to this strategy. Creating new walkways should be a priority as well.

However, we object to the rezoning of current Recreation Passive zoned land to Medium Density Residential Zone, notably the rectangle bounded by Ruataniwha Road, Dobson Place and Jollie Road. This large block of land should not be re-zoned. It currently forms an important part of the northern entrance to Twizel and provides for an uninterrupted view shaft out to the Ben Ohau Range as visitors enter the town. We request the current zoning is kept in place.

Why is Residential Visitor Accommodation treated as a permitted activity (up to 6 guests) within this zone when Precinct 2; Commercial Visitor Accommodation has been implemented? The purpose of these zone changes is to control commercial visitor accommodation activities within certain areas; allowing up to 6 people in any residential zone is basically the same thing and would not achieve that outcome. We would suggest that Resource Consent be required for this activity and be given a Discretionary status. We would also suggest the limit of people onsite be reduced to 4.

- (b) Low Density Residential Zone. In general, we support the proposed plan change in respect of this new proposed zone. This zone provides for less intensive living and is a natural step back from the more intensive Medium Density Residential Zone. Much of this zone is located within proximity of the existing town centre allowing for ease of access via walking and biking. Again, existing pedestrian linkages need to be maintained and improved to ensure the connectivity the zone change is aiming for.

We agree with the Specific Control Area 4 overlay which requires 4,000m² minimum site areas until such time that appropriate servicing is in place. Standard LRZ-S1, Density 2 should be amended to 2,000m² as 1500m² is too small an area for appropriate sewage discharge to ground.

Standard LRZ-S5 1; building coverage should be increased to 50% and 2; building and impervious coverage to 60%. It is likely that only single level buildings will be built within this zone, therefore to comply with these percentages the houses built would be relatively small.

However, we object to the rezoning of current Recreation Active zoned land to Low Density Residential Zone, notably the very large triangular shaped block of land along Ohau Road which currently forms

part of the Twizel Golf Course. Why is this being re-zoned? Is this not currently being used by the Golf Club? This should not be rezoned as it adds to the amenity of Ohau Road, especially now as the new cycle way to Lake Ruataniwha meanders through here. We request the current Recreation Active zoning is kept in place.

Why is Residential Visitor Accommodation treated as a permitted activity (up to 6 guests) within this zone when Precinct 2; Commercial Visitor Accommodation has been implemented? As stated above we would suggest that Resource Consent be required for this activity and be given a Discretionary status. We would also suggest the limit of people onsite be reduced to 4.

- (c) Large Lot Residential Zone. In general, we support the proposed plan change in respect of this new proposed zone. Once again, this new zone will provide a buffer between the more intensive residential zones to the east and the rural zone (including the Mackenzie Basin Subzone) to the west.

The inclusion of Specific Control Areas 1 and 2 is a good idea given both areas lack the appropriate servicing from a sewer and water perspective. This overlay will work well where previous ad hoc development has occurred.

We do however suggest a minor amendment to Standard LLRZ-S5, Coverage where 1, building coverage shall not exceed 25% and 2, building and impervious coverage shall not exceed 40%, We feel these percentages are too low given the single level houses that would be built here. Restricting total building coverage to a maximum of 500m² may be restrictive for some landowners. Increasing these percentages to 35% and 45% respectively would provide more flexibility.

Once again why is Residential Visitor Accommodation treated as a permitted activity (up to 6 guests) within this zone when Precinct 2; Commercial Visitor Accommodation has been implemented? We suggest that Resource Consent be required for this activity and be given a Discretionary status? We would also suggest the limit of people onsite be reduced to 4.

- (d) Town Centre Zone. We support the introduction of this newly named zone. The issue we have is the zone in its entirety is too small, particularly for vehicle access and in particular, the lack of parking. There is a severe shortage of car and camper van parking for this zone, especially in the busy summer months. The Twizel town centre has reached its capacity with no vacant shops anywhere. No re-zoning around the edges is going to solve either of these problems any time soon. The likelihood of any meaningful re-development of proposed newly rezoned Ruataniwha Road and surrounding land for shops or retail activities is minimal unless of course some form of property aggregation occurs. Given the split ownership of the properties this is considered unlikely to happen in the foreseeable future. We propose the allowance of some flexibility within the rules of the Large Format Retail Zone to alleviate some of this pressure, see part (e) below.

We object to the rezoning of current Recreation Passive zoned land to Town Centre Zone along Ruataniwha Road. This land should not be re-zoned as it creates more open space and visual appeal. We request the current zoning is kept in place.

- (e) Large Format Retail Zone. We support in part the introduction of this new zone. However, whilst a positive improvement to the current Industrial Zone, it does not do enough to encourage and enhance the future growth prospects of Twizel. The continuation of the age-old theme of not wanting to impact negatively on the existing town centre should be vanquished effective immediately.

Mackenzie Properties previous developments on Ruataniwha Road (LJ Hooker and The Musterers Hut) and Ostler Road (Poppies Cafe & The Mackenzie Park Shopping Centre) have benefitted the town of Twizel (including the Town Centre) immensely. As a result of these high-profile buildings more and more people have discovered Twizel and ended up within the town centre. Much of this "discovery" is due to the magnets that now attract people off SH 8, giving people a reason to stop and spend their money. We are firmly of the view that not allowing more commercial development within this new zone will in fact work against the Town Centre, leading to its vitality being diminished.

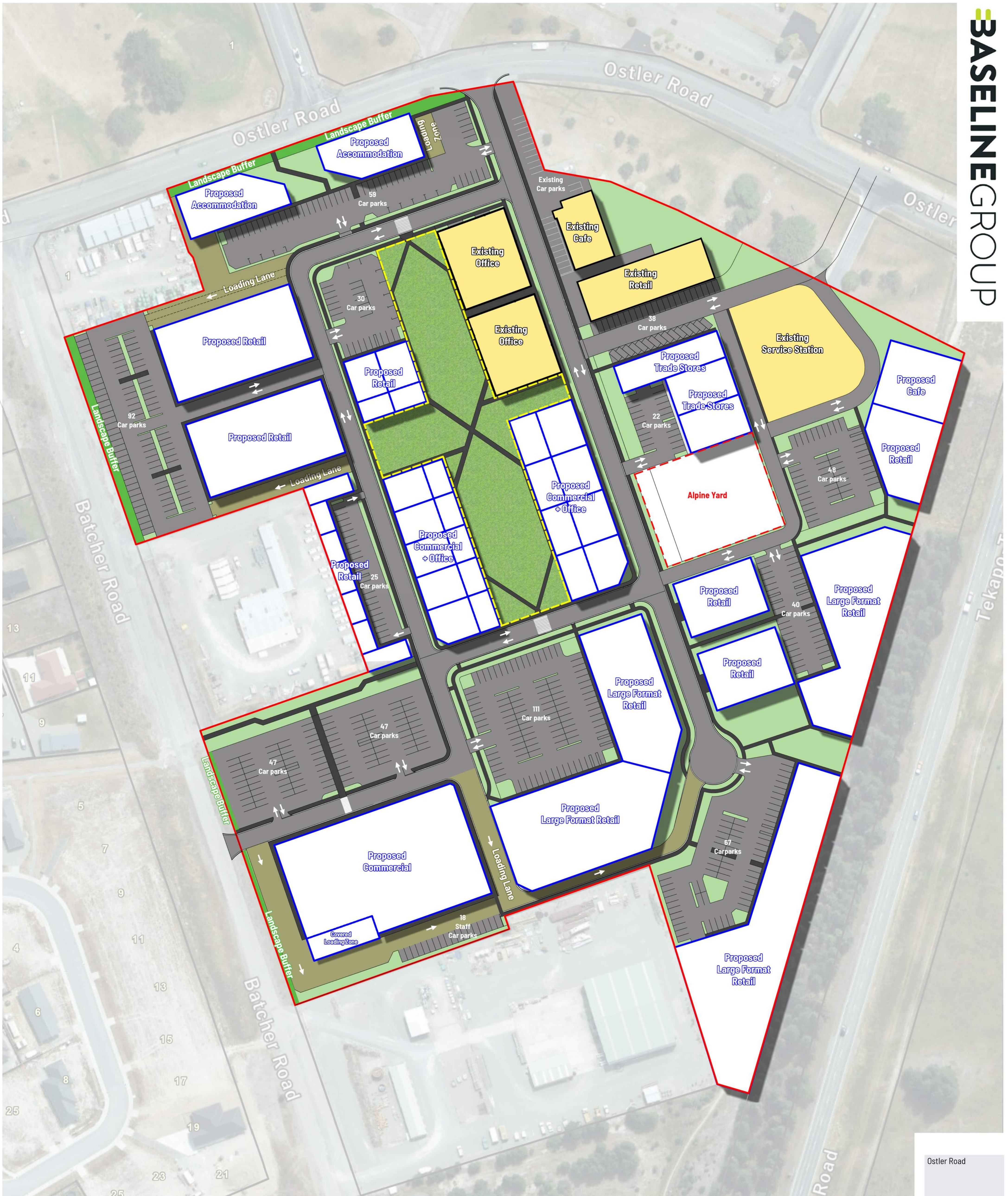
Mackenzie Properties has completed a detailed study of its 9.5-hectare block bounded by Ostler Road to the north, State Highway 8 to the east and what is known as Batcher Road to the east. We had previously submitted this concept to Councils planning team who decided not to progress with this, advising that such a development would detract from the existing town centre. We have attached these plans to this submission and request through the hearing process that Council do indeed look favourably at loosening the current restrictions on retail development within the proposed Large Format Retail Zone. We have plentiful parking space and any development here would work in conjunction with the Town Centre.

We request the following:

- (i) Rule LFRZ-R2, 1; minimum floor area of any individual retail activity be reduced from 500m² down to 200m².
- (ii) Activity status for office accommodation to be clarified. We request this be given a permitted activity status. This could easily be achieved by adding it to rule LFRZ-R2 2; e. office accommodation.
- (iii) Rule LFRZ-R8, Commercial Visitor Accommodation status be amended to Discretionary from Non Complying. Alternatively, the introduction of Precinct 2 onto part of this block of land that sits adjacent to Ostler Road and looks directly up Mackenzie Drive. This is an ideal hotel site as indicated in the attached concept plan and something we have been working on for many years.
- (iv) Any of the assessment matters for any discretionary resource consent incorporate the following points.
 - (a) The availability of land/space for commercial development within the Twizel Town Centre zone and the likelihood of this space being developed within the near term.
 - (b) The complementary nature of the activity proposed and how its existence may well work in conjunction with existing businesses within the Twizel Town Centre.
 - (c) The degree of vibrancy and attractiveness, leading to increased well being for existing residents of Twizel, which any new commercial development brings with it.

3. We seek the following decisions from the Mackenzie District Council:

- (a) That Council backtrack on its intentions to re-zone existing Recreation Active and Passive land to either Town Centre Zone, Medium Density Residential Zone or Low-Density Residential Zone.
- (b) That Residential Visitor Accommodation within the Medium Density Residential Zone, Low-Density Residential Zone and Large Lot Residential zone have its activity status amended from Permitted to Discretionary and that only a maximum of 4 persons at any time may occupy the consented property.
- (c) Building coverage within the Low-Density Residential Zone be increased to 50% of the total site area and 35% within the Large Lot Residential Zone.
- (d) Building and impervious coverage within the Low-Density Residential Zone be increased to 60% of the total site area and 45% within the Large Lot Residential Zone.
- (e) That within the Low-Density Residential Zone, the minimum site area for where a residential unit will not be connected to a reticulated sewage system be increased to 2,000m² where an authorised discharge consent has been obtained from Environment Canterbury.
- (f) Amendments to the Large Format Retail Zone which allows for separate retail development down to 200m² and the allowance of office accommodation space within this zone. Furthermore, the addition of the Commercial Visitor Accommodation Precinct to part of the land owned by Mackenzie Properties Ltd that fronts onto Ostler Road and bounded by Benmore Place.



KEY



- Site Boundary
- Walking And Cycling Path
- Landscape
- Commercial Centre Reserve

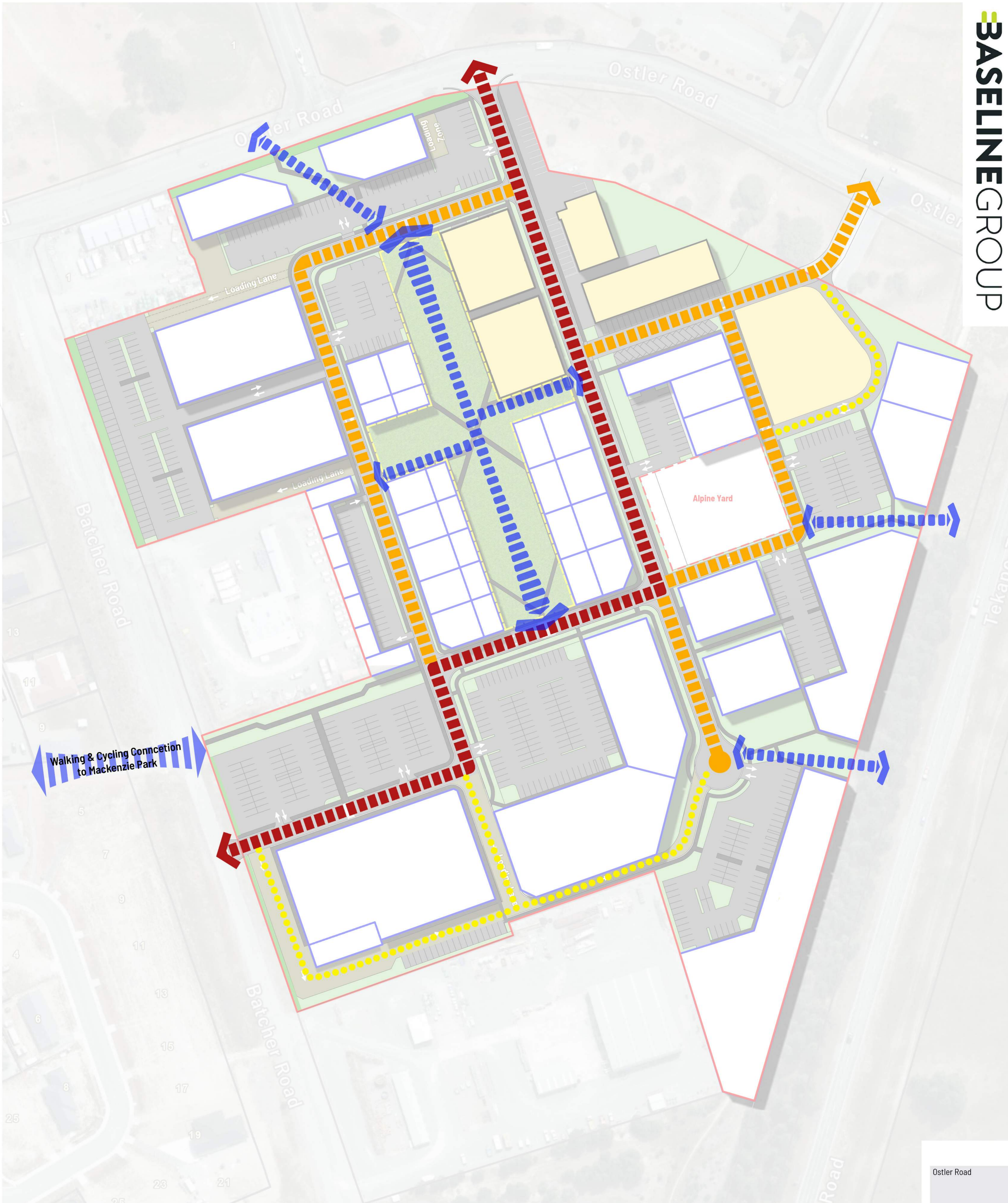
Ostler Road

Scale 1:750 @A1, 1:1500@A3
 Date 19 Mar 2021
 Design EL
 Drawn EL
 Review JF

A 30/06/22 RFI

Rev.	Date	Amendment
Revision	A	

Sheet 1



KEY

- Site Boundary
- Primary Road
- Secondary Road
- Minor Service Road
- Walking & Cycling Connection

Ostler Road		
Scale	1:750 @A1, 1:1500 @A3	
Date	19 Mar 2021	
Design	EL	
Drawn	JF	
Review	JF	
A	30/06/22	RF1
Rev.	Date	Amendment
Revision	A	
Sheet	2	