

From: Katherine Forward <katherine.forward@duncancotterill.com>

Sent: Wednesday, 25 June 2025 7:32 pm

To: Narissa Armstrong <Narissa.Armstrong@tasman.govt.nz>

Cc: Derek McLachlan <derek.mclachlan@duncancotterill.com>

Subject: PC79 - comments on behalf of the lower Queen Street landowners regarding planning conferencing

Good evening Narissa,

Further to the panel's directions, please see below a list of suggested questions that may assist to guide the planners in expert conferencing. Mr Taylor has contributed to this list. These questions relate solely to the lower Queen Street Light Industrial zone, the focus of my clients' submissions.

- Do you consider the relevant higher order documents target avoidance of increased risk rather than avoidance of subdivision, use and development in areas prone to coastal hazards?
- Specific to the lower Queen Street Light Industrial zone, of the relevant (key) statutory considerations, where do you agree and disagree as to whether these are met?
- Is the existing built form (buildings and seawall/ structures) on the seaward side of lower Queen Street relevant when considering the appropriate activity status for subdivision within the scheduled area, and if so, why?
- What evidence is before the panel that would justify the introduction of a prohibited activity status for subdivision in Schedule 17.4A?
- With respect to potential prohibition on subdivision within Schedule 17.4A, does the s32 evaluation report assess the matters referred to in s32(2)?
- What regulatory/ non-regulatory measures are available to Council to manage risk and minimise liability associated with development within the Schedule 17.4A area?
- Within the lower Queen Street Light Industrial zone should subdivision, use and development within Schedule 17.4A be managed differently to land outside the scheduled area?
- What changes to the boundaries of Schedule 17.4A would promote plan efficiencies? Identify any agreed boundary changes on a plan.
- Taking into account other Light Industrial live zones within the vicinity, if subdivision were to be restricted, what would an appropriate minimum lot size be within the scheduled area?
- Are there any improvements that could be made to the drafting of the exemption pathway proposed by the lower Queen Street landowners?
- How do you think the referenced 'short' 'medium' and 'long' term timeframes will be interpreted by plan users/ Council staff?

On a related note, I can confirm that Mr Taylor is reasonably available over the next couple of weeks but is unavailable Thursday 10 and Friday 11 of July 2025.

In terms of conferencing logistics, it may be preferable to schedule two separate conferences – one, to address the lower Queen Street Light Industrial Zone matters, and the second to address everything else. This may well suit the

Council planning staff as Mr Butler appears to be responsible for the planning inputs relevant to the lower Queen Street Light Industrial zone and Ms Honey all other matters.

For the avoidance of doubt, I consider it would be inappropriate for Mr Percy to attend and contribute to conferencing on the lower Queen Street Light Industrial zone as he presented no evidence on these matters at hearing.

If we can be of further assistance, please advise.

Kind regards

Katherine Forward
Partner | **Duncan Cotterill**