

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES DISTRICT COUNCIL**

UNDER the Resource Management Act 1991

IN THE MATTER of a submission on the Queenstown
Lakes Proposed District Plan

BY **TUSSOCK RISE LIMITED (#3128)**
ALPINE ESTATE LTD (#3161)
BRIGHT SKY LAND LTD (#3130)
Submitter

SUPPLEMENTARY STATEMENT OF EVIDENCE ON NPS-UD 2020

BLAIR JEFFREY DEVLIN

ON BEHALF OF THE SUBMITTERS

Dated: 10 August 2020

INTRODUCTION

- [1] My name is Blair Devlin. I am a Senior Planner at Vivian+Espie Ltd, a planning and landscape consultancy based in Queenstown. I have previously provided a written brief of evidence in relation to the relief sought by Tussock rise Ltd, Bright Sky Land Ltd and Alpine Estate Ltd (together 'Tussock Rise').
- [2] In this supplementary brief of evidence I respond to the Stage 3 Hearing Panel's Minute 28, dated 27 July 2020 seeking comment on the differences between the National Policy Statement on Urban Development 2020 (NPS-UD) which will come into effect on 20 August 2020, and its predecessor (the National Policy Statement for Urban Development Capacity 2016 (NPS-UDC)).

URBAN ENVIRONMENT

- [3] The NPS UDC defines an 'urban environment' as:

urban environment means any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

- (a) *is, or is intended to be, predominantly urban in character; and*
- (b) *is, or is intended to be, part of a housing and labour market of at least 10,000 people*

- [4] I have reviewed the 2018 Census data on the Statistics New Zealand website, and the Statistical Areas for Wanaka Waterfront (2,121), Wanaka North (2,412), Wanaka Central (1,263) and Wanaka West (1,725) totals 9,552 usually resident population. While this is slightly less than the required 10,000, the definition does state "intended to be part of" a housing and labour market of 10,000 people. Given the Census data is now two years old and growth has occurred since the Census was undertaken, plus the fact that zoned land would suggest Wanaka is 'intended' to be a housing market of at least 10,000 people, I am satisfied the Wanaka urban area can be considered an urban environment.



Figure 1: 2018 census, Statistical Area for Wanaka ¹

ASSESSMENT

[5] The NPS-UD uses the term “well-functioning urban environment” (Objective 1), and in Policy 1, goes on to elaborate on what the term means. In Policy 1, planning decisions are to contribute to well-functioning urban environments that, as a minimum:

- (a) *have or enable a variety of homes that:*
 - (i) *meet the needs, in terms of type, price, and location, of different households; and*
 - (ii) *enable Māori to express their cultural traditions and norms; and*
- (b) *have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and*
- (c) *have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and*
- (d) *support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and*
- (e) *support reductions in greenhouse gas emissions; and*
- (f) *are resilient to the likely current and future effects of climate change.*

[6] I consider the submission seeking a BMUZ instead of a GIZ is aligned with a well-functioning urban environment as described in Policy 1.

[7] With regard to (a), the BMUZ enables a range of different styles and types of housing compared to a more traditional low or medium density residential zoning. Multi-unit homes tend to be smaller and more affordable, which is the part of the market not well provided for in

¹<http://statsnz.maps.arcgis.com/apps/webappviewer/index.html?id=6f49867abe464f86ac7526552fe19787>

Wanaka at present. With regard to (b), the large Tussock Rise site can be developed to enable a variety of sites that are suitable for different business sectors.

[8] With regard to (c), the Tussock Rise submission achieves this part of the policy, it provides excellent accessibility between housing, jobs, community services and open spaces. The area is to be serviced by planned public transport², and will be in high demand given its proximity to amenities, community services, topography and aspect.

[9] With regard to (d), as noted in my primary evidence, the BMUZ at Anderson Heights is developed, and the only vacant BMUZ will be in a single ownership (local monopoly) at Three Parks if that re-zoning is approved. That is not a competitive land market (also refer Objective 2).

[10] **Objective 3** in particular provides support for BMUZ being appropriate within the Tussock Rise site:

Objective 3: *Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:*

- a) *the area is in or near a centre zone or other area with many employment opportunities*
- b) *the area is well-serviced by existing or planned public transport*
- c) *there is high demand for housing or for business land in the area, relative to other areas within the urban environment.*

[11] This policy of the NPS-UD has a similar theme to the BMUZ zone purpose statement, which refers to complementary commercial, business, retail and residential uses that supplement the activities and services provided by town centres³.

[12] The proposed BMUZ zoning is near the Wanaka town centre as well as the Three Parks Commercial Zone. It is also in close proximity to the proposed Three Parks Business Zone⁴, and other areas proposed to be retained as GIZ in the Tussock Rise submission. All of which will provide employment opportunities.

² QLDC *Wanaka Network Operating Framework Report* dated August 2018 Appendix C Figure 4

³ QLDC PDP Chapter 16 *Business Mixed Use*, 16.1 Zone Purpose

⁴ S42A report Nicholas Roberts on Three Parks

[13] The area is to be serviced by planned public transport⁵, and will be in high demand for housing given its proximity to amenities, community services, topography and aspect.

[14] **Policy 5** also provides support for an increased density of urban form, where residing in this location will allow a high level of accessibility to a range of commercial activities and community services (including Wanaka Recreation Centre and the primary school Te Kura O Take Karara).

Policy 5: *Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:*

(a) *the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*

(b) *relative demand for housing and business use in that location.*

[15] The actual demand for business land is a driving factor behind the proposed BMUZ zoning, which also contributes to an urban form which has good accessibility between housing and jobs (**Policy 1(c)**). I therefore consider the NPS-UD provides support for the BMUZ and its extent as proposed in the Tussock Rise submission.

[16] Objective 6 is also relevant in that local authority decisions on urban development that affect urban environments are to be (b) '*strategic over the medium term and long term*'. In my evidence I set out the changing strategic context of what I called the 'Wanaka Industrial Area', and whether a GIZ was suitable given that changing strategic context. Taking a long term view, I remain of the view that a more restrictive GIZ is not ideal in this location given the surrounding land uses and existing mixed nature of the area.

[17] I therefore consider the Tussock Rise submission is consistent with, and not contrary to, the new NPS-UD.

⁵ QLDC *Wanaka Network Operating Framework Report* dated August 2018 Appendix C Figure 4