

Before the Hearings Panel

In the Matter of the Resource Management Act 1991

And

In the Matter of the Proposed Queenstown Lakes District Plan – Stage 3

Brief of Supplementary Evidence on National Policy Statement on
Urban Development 2020 of **Hayley Jane Mahon** for
Bush Creek Property Holdings Limited and Bush Creek Property
Holdings No. 2 Limited (submitter #3353),
Bush Creek Investments Limited (#3354) and
M J Thomas (#3355)

Dated: 7 August 2020

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INTRODUCTION

1. My name is Hayley Jane Mahon. I hold the position of planner at John Edmonds and Associates. I have previously provided a written brief of evidence in relation to the relief sought by the submitters Bush Creek Property Holdings Limited, Bush Creek Property Holdings No. 2 Limited, Bush Creek Investments Limited and M J Thomas.
2. In this supplementary brief of evidence I respond to the Stage 3 Hearing Panel's Minute 28, dated 27 July 2020 seeking comments on the differences between the National Policy Statement on Urban Development 2020 (NPS-UD) to come into effect on 20 August 2020 and its predecessor, the National Policy Statement for Urban Development Capacity 2016 (NPS-UDC).

NPS-UD

3. I consider that the NPS-UD builds on the NPS-UDC and does not provide any barrier to and supports the rezoning the proposed Bush Creek General Industrial Zone ('GIZ') to Business Mixed Use ('BMU').
4. I have focussed this evidence on the Objectives and Policies in Part 2 of the NPS.
5. In my opinion, Arrowtown forms part of the Queenstown urban environment as although it is separated geographically from Queenstown, it is urban in character and is part of the larger Queenstown housing and labour market of at least 10,000 people.

Objectives and Policies

6. I agree with Ms Scott in that a change in the NPS is the introduction of the "well-functioning urban environment" in Objective 1 and Policy 1. I note that at Policy 2.2(b), (c) and (d), well-functioning urban environments should have a variety of sites that are suitable business sectors in terms of location and size, which have good accessibility between housing and jobs and support development markets. If applied to Arrowtown, the zoning of Bush Creek as solely industrial land is not going to facilitate a variety of business sectors, will not support good accessibility between housing and a variety of jobs and will not support the competitive operation of land and development markets.
7. Objective 3 directs that district plans should enable more businesses and community services to be located in areas of an urban environment which are near a centre zone (e.g. the Arrowtown village centre).
8. Objective 4 reminds us that urban environments and amenity values develop and change over time. The Bush Creek area was once on the outskirts of Arrowtown and was logically a more industrial type area within a more self-contained Arrowtown setting. However, the urban environment and amenity values of that area and the function of Arrowtown within the wider Queenstown urban environment have

changed over time with Bush Creek now being enclosed by residential land and Arrowtown being more integrated with the wider Queenstown urban environment.

9. Objective 6 directs that local authority decisions on urban development are integrated with infrastructure planning and funding decisions. It should be noted that the Bush Creek area is away from the main arterial routes into Frankton and Queenstown which a lot of infrastructure and master planning work is going into. To get industrial traffic to the Bush Creek area, you have to drive through either McDonnell Road, Malaghans Road or Arrowtown-Lake Hayes Road and then through the residential areas either side of Manse Road. The Bush Creek area is not a logical location for an industrial area and associated heavy traffic.
10. In terms of Policy 2 and the requirement to ensure sufficient development capacity for short, medium and long term – this requirement was in the original NPS-UDC and so this is no change to include it here. It should be noted that this area at Bush Creek is of a small size (only 4.27ha) and according the Economic Assessment of Queenstown Lakes District's Industrial Zones carried out in 2019, there is 32.99ha of vacant land for industrial land use in Queenstown and 37.4ha of vacant land available for industrial use in Wanaka¹. There is enough capacity in the short, medium and long term to meet the demand for industrial use. The change in zoning at Bush Creek from the proposed GIZ to BMU is not going to impact on the Council's ability to provide enough industrial land capacity in the short, medium and long term giving the area is not suited to such activities.
11. Policy 9 and the recognition of the principles of the Treaty of Waitangi is a new introduction to the NPS compared to the previous NPS-UDC.
12. Policy 10 and the direction for local authorities to work together when implementing the NPS. This is also a direction in the NPS-UDC. I consider that the neighbouring local authority, Central Otago District Council, should be consulted with when implementing the NPS. The Cromwell area is increasingly part of housing and labour market of Queenstown and Wanaka and could provide additional industrial land in the future which is well-connected to State Highways. Cromwell is no different to Queenstown and Wanaka as Ms Scott describes "...non-contiguous urban areas..." with "functional relationships"².
13. An example of QLDC considering Cromwell as relevant to wider planning decisions is in the QLDC Spatial Plan consultation exercise (part of the Future Development Strategy that must be completed under the NPS-UDC and NPS-UD), Cromwell is included as part of the sub-region considered. See image below:

¹ Economic Assessment of Queenstown Lakes District's Industrial Zones 2019 by M.E Consulting, pg 92

² Memorandum of Counsel regarding National Policy Statement on Urban Capacity 2020 dated 31 July 2020 at 6.4(a).

Geographic extent

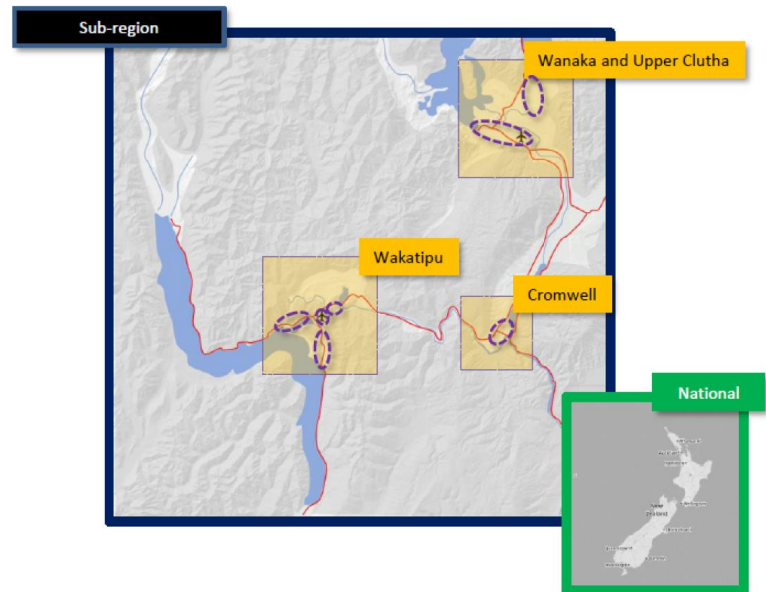


Figure 1: Geographic Extent, “Developing a Spatial Plan for the Queenstown Lakes District”. Dated October 2019

14. Policy 10 directs local authorities to engage with the development sector to identify significant opportunities for urban development. This policy was present within the NPS-UDC as well.
15. Policy 11 in relation to removing minimum car parking rate requirements was not in the NPS-UDC and has to be implemented with 18 months.

Implementation

16. Subpart 4 – The Future Development Strategy (FDS) requirement still remains in the NPS. I note under the NPS-UDC, this FDS was required to be completed by 31 December 2018. As described by Mr Place in his opening statements, the FDS is still being developed.
17. An additional requirement for the business development capacity assessment which wasn't included in the NPS-UD is the requirement for the capacity to be 'suitable' (3.29(2)) which includes suitability in terms of location and size. The suitability of the location of industrial land at Bush Creek has already been discussed above. In terms of the size of sites at Bush Creek, the 7m setback imposed by the GIZ when adjacent to residential zones (most Bush Creek properties adjoin residential land in some way) will impact on the viability of sites in Bush Creek to be redeveloped for industrial use.

Conclusion

18. The NPS-UD continues the main themes of the NPS-UDC and supports the rezoning of the land at Bush Creek from the proposed GIZ to BMU. The policies around providing sites for suitable business sectors in proximity to housing, amenity values for sites changing over time, decisions on urban development being

integrated with infrastructure planning all support a Business Mixed Use Zone at Arrowtown over a General Industrial Zone.

A handwritten signature in black ink, appearing to read "H. Mahon", is centered within a light gray rectangular box.

Hayley Jane Mahon

7 August 2020