

**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)**
Submitter

**STATEMENT OF EVIDENCE OF PAUL DAVID MILLER ON BEHALF OF
THE SUBMITTER**

Dated: 29 May 2020

MAY IT PLEASE THE PANEL:

Introduction

[1] My name is Paul David Miller. I am a director of Tussock Rise Limited. I have lived in Wanaka since 1976. I have owned several businesses in Wanaka over the last 43 years and have been an active real estate licensee for the past 20 years. I have an intimate knowledge of the property needs in the Wanaka commercial real estate market.

Scope of Evidence

[2] When I read the Council section 32 report, I felt the results of the ground truthing exercise undertaken did not match what I was seeing on the ground in Wanaka.

[3] I have therefore personally inspected every available tenancy on the properties with a boundary to the Tussock Rise land. In total there are 94 tenancies proposed under stage 3 of the PDP to be zoned General Industrial plus the Bright Sky Land Ltd residential land. There are:

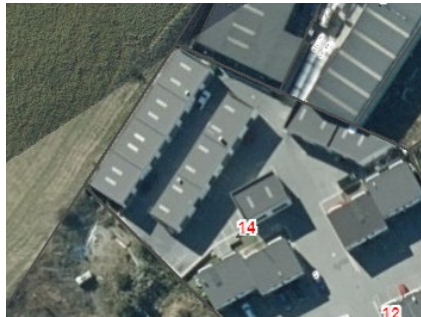
- (a) fourteen units at 21 Gordon Road, each with the ability to have two tenancies:



- (b) at 25 Gordon Road there are 4 tenancies and



- (c) at 12 Frederick Street there are 14 units with the ability to have two tenancies and ten units with one tenancy.



- (d) At 80 Ballantyne Road there is one Record of Title with eleven tenancies.



[4] Attached to this evidence is a spreadsheet detailing the activity currently carried out at each of the 94 tenancies on the Tussock Rise boundary. There is also photographic evidence of the tenancies. I provided this record to Mr Devlin, who then categorised them into activities according to the 'best fit' PDP definition. Mr Devlin has commented on the results from a planning perspective in his evidence.

[5] The results of my ground truthing are shown in the table below.

PDP Definition	<i>Number</i>	<i>Percentage</i>
Commercial	23	24.7%
Commercial Recreation Activity	3	3.2%
Health Care Facility	2	2.1%
Industrial Activity	18	19.3%
Residential Activity	17	18.2%
Service	22	23.4%
Trade supplier	5	5.4%
Vacant	4	4.3%
Total	94	100%

[6] On the Tussock Rise boundary, approximately 42% of adjoining sites are occupied by industrial and service activities, compared to 58% non-industrial / service activities. i.e. the split is 42% industrial & service / 58% non-industrial / service activities.

[7] This is the inverse of the Council ground truthing that showed a split of 58/42 for the *Industrial B* zone.

[8] For the Wanaka *Industrial A* zone, I understand the Council's S42A report in paragraph 8.7 states "...*The ground truthing results conducted as part of the S32 in fact demonstrate that 53.3% of all recorded predominant activities within the Wanaka ODP Industrial Zone comprised Service activities and Light Industrial activities*¹⁷⁵. i.e. the split is 53% / 47%.

[9] All of this confirms that the area is mixed use in nature. In fact, if the land in Gordon Rd, Ballantyne Rd and Frederick St is zoned GIZ there will be 40 of the 94 tenancies which currently have permitted status and 54 that don't (only **42.5%** permitted). If this land is zoned BMUZ there will be 66 of the 94 tenancies that have permitted status and 28 that don't (**70.2%** permitted).

- [10] My observation of the industrial activities is that most are very 'light' in nature, for example Mr Devlin categorised a florist as industrial because they manufacture bouquets on site with an ancillary retail component. These types of industrial activities are not likely to cause a concern.
- [11] I must emphasise to the Panel that all the properties on Gordon Road, Ballantyne Road (west side) and Frederick Street which are now proposed to be zoned General Industrial, were zoned Industrial A when they were developed. Industrial A is quite enabling compared with General Industrial and is much more akin to Business Mixed Use. Hence the obvious anomalies with the majority of businesses and residential tenancies in this area under the proposed GIZ and the reason these areas should be zoned BMU along with the Tussock Rise land. This will alleviate most of the problems that could be encountered with reverse sensitivity as the businesses will all fit within their respective correct zone.
- [12] **The Community need.** Tussock Rise tested the market for industrial use by releasing a plan of an industrial subdivision to the open market through real estate companies. What the company found was there were some investors that believed the land would increase in value as realisation set in that it should have a different zoning, and the other interested parties were owner occupiers that wanted smaller spaces with accommodation (prohibited) attached so that they could sell their houses and move onto the site. They would then have the cash to set up and operate their business until they could afford to buy a house to live in and put their staff in the residential unit on site. This would give them staff retention along with security on site. The other buyers were wanting more like 250m² of retail space attached to a warehouse. The current Industrial B zoning allows for a maximum of 100m² of retail and the proposed GIZ reduces that limit to 50m². The other interest was for office space to set up an IT park with programmers working for the likes of Google and Disney. This is not permitted in GIZ but is permitted in BMUZ.

[13] **The topography.** The Tussock Rise land is on an elevated plateau above the surrounding business area. It seems a strange planning move to make this land available for “the less desirable industrial activities” (quote QLDC management) when it has LDSR on one boundary and effectively mixed use on the other 3 boundaries.

[14] As previously stated, I have lived in Wanaka since 1976 and am happy to answer any questions the Panel may have about the town, its growth over the years and the current needs of the business community.

Paul Miller

Attachments:

A – Table of results of ground truthing (Devlin additions for activity category & status)

B – Photographs of premises

C – Wilson & Dorset letter

D – Salmond Architecture letter

Address	Business name & type	Most likely PDP activity definition (refer list)	Status	Status GIZ	Status BMUZ	Comments
21A Gordon Rd Ground Level	Van Walt - Scientific equipment seller	Commercial Activity (Retail)		PRO	P	
21A Gordon Rd Upper Level	Residential flat	Residential Activity		PRO	P	
21B Gordon Rd GL	Green Room - Florist	Industrial activity		P	NC	Makes bouquets and sells on site (ancillary retail)
21B Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21C Gordon Rd GL	Laser Electrical - Electrician	Service Activity		P	P	
21C Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21D Gordon Rd GL	Dunlop Builders - Offices	Commercial Activity (Retail)		PRO	P	
21D Gordon Rd UL	Wilson & Dorset - Offices	Commercial Activity (Retail)		PRO	P	
21E Gordon Rd GL	Nexus - Real Estate Agent	Commercial Activity (Retail)		PRO	P	
21E Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21F Gordon Rd GL	Wilson & Dorset - Warehouse storage	Service Activity		P	P	
21F Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21G Gordon Rd GL	Perriam - Seamstress & office	Industrial activity		P	NC	
21G Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21H Gordon Rd GL	Central Lakes Physio & Pilates	Health Care Facility		NC	P	Not listed in GIZ table
21H Gordon Rd UL	Central Lakes Physio & Pilates	Health Care Facility		NC	P	Not listed in GIZ table
21I Gordon Rd GL	Good Vibrations - Snowboard importer	Service Activity ?		P	P	
21I Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21J Gordon Rd GL	Body Garage - Fitness & Yoga studio	Commercial Recreational Activity		NC	P	
21J Gordon Rd UL	Body Garage - Fitness & Yoga studio	Commercial Recreational Activity		NC	P	
21K Gordon Rd GL	Vacant garage	N/A Vacant				
21K Gordon Rd UL	Vacant Residential flat	Residential Activity		PRO	P	
21L Gordon Rd GL	Central Heating Solutions - Heat pump supply & service	Service Activity		P	P	
21L Gordon Rd UL	Central Heating Solutions - Offices	Service Activity		P	P	
21M Gordon Rd GL	Salmond Architecture - Architect's offices	Commercial Activity		PRO	P	
21M Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
21N Gordon Rd GL	Goodstays - Property Management	Commercial Activity		PRO	P	
21N Gordon Rd UL	Residential flat	Residential Activity		PRO	P	
23 Gordon Rd	Aotea Electric - Electrician	Trade supplier Activity		D	RD	
23 Gordon Rd	Veolia - QLDC Water Dept Depot	Industrial activity		P	NC	
25A Gordon Rd	Pukka & Print It - Signs & Print	Industrial activity		P	NC	
25B Gordon Rd	Entertainment Solutions - Audio Visual Eqpt Hire	Service Activity		P	P	
25C Gordon Rd	Residential flat	Residential Activity		PRO	P	
25D Gordon Rd	Geosolve - Offices	Commercial Activity (Retail)		PRO	P	
27 Gordon Rd	Southern Lakes Panel - Panelbeaters	Service activity		P	P	
29 Gordon Rd	Southern Lakes Panel - Panelbeaters	Service activity		P	P	
80A Ballantyne Rd	Optimum Trim- Upholsterer	Service activity		P	P	
80B Ballantyne Rd	Cabinetree - Joiner	Industrial activity		P	NC	
80C Ballantyne Rd	Simon King - Woodworker/Furniture maker	Industrial activity		P	NC	
80D Ballantyne Rd	Polished Concrete Central - Floor grinder	Industrial activity		P	NC	
80E Ballantyne Rd	Cabinetree - Joiner	Industrial activity		P	NC	
80F Ballantyne Rd	EmerGe Joinery	Industrial activity		P	NC	
80G Ballantyne Rd	Otago Fixers	Service activity		P	P	
80H Ballantyne Rd	Foley plumbers	Service activity		P	P	
80I Ballantyne Rd	Business storage	Service activity		P	P	
80J Ballantyne Rd	Residential flat	Residential Activity		PRO	P	
80 Ballantyne Rd	Container storage	Service activity		P	P	
82 Ballantyne Rd	Firth - Concrete batching plant	Industrial activity		P	NC	
86 Ballantyne Rd	Turnkey homes - Offices & builders storage	Service activity		P	P	
92 Ballantyne Rd	Breens - Builder's offices & yard	Service activity		P	P	
96 Ballantyne Rd	Placemakers - Trade supplier & retail	Trade supplier Activity		D	RD	
9 Connell Tce GL	Maude Wines	Industrial activity		P	NC	
9 Connell Tce UL	Maude Wines - Residential flat/office	Residential Activity		PRO	P	
12/1 Frederick St Ground Lvl	Quality Curtains - Curtain makers	Industrial activity		P	NC	
12/1 Frederick St Upper Lvl	Quality Curtains - Curtain makers showroom	Industrial activity		P	NC	
12/2 Frederick St GL	Wanaka Appliance repairs	Service activity		P	P	

12/2 Frederick St UL	Residential flat	Residential Activity	PRO	P
12/3 Frederick St GL	Watertight systems - office	Commercial Activity	PRO	P
12/3 Frederick St UL	Guy Hershell Architects - Architect office	Commercial Activity	PRO	P
12/4 Frederick St GL	For lease	N/A Vacant		
12/4 Frederick St UL	For lease	N/A Vacant		
12/5 Frederick St GL	Snopro - Ski rental	Commercial Activity	PRO	P
12/5 Frederick St UL	Vacant office	Commercial Activity	PRO	P
12/6 Frederick St GL	ACL Communications	Commercial Activity	PRO	P
12/6 Frederick St UL	ACL Communications	Commercial Activity	PRO	P
12/7 Frederick St GL	BeSure - Insurance office	Commercial Activity	PRO	P
12/7 Frederick St UL	BeSure - Insurance office	Commercial Activity	PRO	P
12/8 Frederick St GL	Manage My House - Property Manager office	Commercial Activity	PRO	P
12/8 Frederick St UL	Deb Inder - Lawyer office	Commercial Activity	PRO	P
12/9 Frederick St GL	Allied Alarms/ AP framing - picture framer	Industrial activity	P	NC
12/9 Frederick St UL	Residential flat	Residential Activity	PRO	P
12/10 Frederick St GL	4X4 Play - retail 4wd parts	Commercial Activity	PRO	P
12/10 Frederick St UL	Kanuka Studio - Design Office	Commercial Activity	PRO	P
12/11 Frederick St GL	Kitchen Trends - Kitchen showroom	Trade supplier Activity	D	RD
12/11 Frederick St UL	Architects Plus - Architect office	Commercial Activity	PRO	P
12/12 Frederick St GL	Cakes of Wanaka - Cake maker	Industrial activity	P	NC
12/12 Frederick St UL	Residential flat	Residential Activity	PRO	P
12/13 Frederick St GL	Venus Coffee - Coffee roasters	Industrial activity	P	NC
12/13 Frederick St UL	Foleys Plumbers	Service Activity	P	P
12/14 Frederick St GL	Ashton Wheelans - Accountants	Commercial Activity	PRO	P
12/14 Frederick St UL	Ashton Wheelans - Accountants	Commercial Activity	PRO	P
12/15 Frederick St	Aspiring glass - glass & door supplier	Industrial activity	P	NC
12/16 Frederick St	Private storage	Service Activity	P	P
12/17 Frederick St	Private storage	Service Activity	P	P
12/18 Frederick St	Business storage & office rented separate	Service Activity	P	P
12/19 Frederick St	Airmax - Heatpump sales & service	Commercial Activity	PRO	P
12/20 Frederick St	Private storage	Service Activity	P	P
12/21 Frederick St	Wanaka wood floors - flooring supplier	Trade supplier Activity	D	RD
12/22 Frederick St	Switch Fitness - Gym	Commercial Recreational Activity	NC	P
12/23 Frederick St	Euro glass - glass supplier	Trade supplier Activity	D	RD
12/24 Frederick St	Paradise Pools, Inline Electrical	Service Activity	P	P
16 Frederick St	Rockbourne Holdings -Vacant site	N/A Vacant		
20 Frederick St	Maude Wines -Winery	Industrial activity	P	NC
Lot 102 Avalon Station Rd	Bright Sky Land - Residential land	Residential Activity	PRO	P



66 Ballantyne Road



80A&B Ballantyne Road



80C Ballantyne Road



80D Ballantyne Road



80E&F Ballantyne Road



80F,G&H Ballantyne Road



80I&J Ballantyne Road



80 Ballantyne Road



80 J Ballantyne Road



82 Ballantyne Road



86 Ballantyne Road



92 Ballantyne Road



96 Ballantyne Road



12/1 Frederick Street



12/2 Frederick Street



12/3 Frederick Street



12/4 Frederick Street



12/5 Frederick Street



12/6 Frederick Street



12/7 Frederick Street



12/8 Frederick Street



12/9 Frederick Street



12/10 Frederick Street



12/11 Frederick Street



12/12 Frederick Street



12/13 Frederick Street



12/14 Frederick Street



12/15 Frederick Street



12/16 Frederick Street



12/17 Frederick Street



12/18 Frederick Street



12/19 Frederick Street



12/20 Frederick Street



12/21 Frederick Street



12/22 Frederick Street



12/23 Frederick Street



12/24 Frederick Street



16 Frederick Street



20 Frederick Street



27&29 Gordon Road



25A-D Gordon Road



23 Gordon Road



23 Gordon Road



21 I-M Gordon Road



21 A-F Gordon Road



21 A Gordon Road



21 B&C Gordon Road



21 D Gordon Road



21 E&F Gordon Road



21 G&H Gordon Road



21 I Gordon Road



21 J Gordon Road



21 K Gordon Road



21 L Gordon Road



21 M Gordon Road



21 N Gordon Road



21 I-M Gordon Road

Wilson & Dorset

Ref; Letter in support of submissions AGAINST - Stage 3 Proposed District Plan Change
General Industrial Zoning

Wilson & Dorset Ltd are an owner occupier of property located in the 21 Gordon Road business hub which is included in the stage 3 PDP proposed change to General Industrial Zoning

The proposed plan change to General Industrial Zoning will have a material impact on Wilson & Dorset business and other similar businesses as well as the owners of property within the area. We support all submission AGAINST the proposed plan change and wish to support retention of the current zoning and or alternative Business Mixed Use zoning.

As business and property owners within the area we were not aware of the proposed plan change and the implications to our property and business. We accept that the proposed plan change was publicly notified however the notification process was not sufficiently clear as to the potential impact on our property and business. We have not been contacted directly by QLDC or any representatives of QLDC around the potential impact of the proposed plan change on our property or business. Had we been made aware of the implications of the proposed General Industrial zone change we would have made a formal submission against the proposed plan change.

Wilson & Dorset operates commercial offices and warehouse space from units 21D and 21F Gordon Road to support our design, manufacturing and retail business.

The 21D Gordon Road business hub is a very good example of Business Mixed Use zoning working successfully to support a vibrant mix of commercial businesses and residential owner occupiers including Wilson & Dorset, Perrium Merino, Salmond Salmond Architecture, Green Room Florists, Dunlop Building, Body Garage and other businesses.

Wanaka needs more Business Mixed Use zoning to support innovative design led businesses such as Wilson & Dorset. (Wilson & Dorset employ's 10 full time equivalent staff)

Wanaka needs more Business Mixed Use zoning as opposed to more General Industrial Zoning to support building a more sustainable town and business community going forward.

We understand that Wilson & Dorset would still have the benefit of existing use rights (Grandfathering rights) under any proposed plan change. The proposed plan change and more restrictive rights under any change of ownership or use will however undermine the underlying asset value of the property.

Wilson & Dorset

Wilson & Dorset and other owner occupying businesses rely on the underlying asset value of the property to support the bank funding of the business. Any reduction in asset values due to the proposed plan change risks compromising the ability of Wilson & Dorset to utilise the underlying asset value of the property to fund the business.

It is very easy for a planner to draw a line on a map or plan without taking into consideration the implications for the existing businesses and property owners located within the area of the proposed zone change. I believe it is important for QLDC planners to consult with the impacted property owners and businesses to understand the implications of the proposed changes to the zoning. The fact that property owners and businesses such as ourselves were not aware of the implications of the proposed plan change would indicate that QLDC has not made any endeavours to consult with the property owners or understand the full implications of the proposed zone change beyond the formal public notification process.

We would invite QLDC planners and anyone involved in the proposed plan change process to visit the area and 21D Gordon Road business hub where our businesses operate from to meet with business owners and view Business Mixed Use zoning operating successfully before making any decisions around the proposed plan change

Yours sincerely

Ben Wilson
Director
Wilson & Dorset

Queenstown Lakes District Council
Planning Officer
Proposed District Plan Change

Re: QLDC Proposed District Plan Change

Letter in support of submissions AGAINST - Stage 3 Proposed District Plan Change General Industrial Zoning

We support all submissions AGAINST the proposed plan change and wish to support retention of the current Industrial A zoning and existing use or a change to Mixed Business use.

ASF Trust is the owner and Salmond Architecture is an occupier of the property located at 21M Gordon Road which is included in the stage 3 PDP proposed change to General Industrial Zoning. Anne Salmond also occupies the upper level of 21M as a residence.

Proposed re-zoning

The location of the proposed Industrial General area including and adjacent to existing mixed use and residential areas on raised land close to the centre of Wanaka should be reconsidered.

As Wanaka is growing, and with the development of Three Parks, the industrial area is no longer on the edge of town but now inappropriately near the centre on land that currently has mixed use and would be more appropriately zoned for Business Mixed Use.

This could be addressed by adjusting the proposed zoning on the ridge between and including Gordon Road and Frederick Street from Industrial to Business Mixed Use.

The industrial area would be better located on the lower level land that does not have the views and aspect of the land on the ridge between Gordon Road and Frederick Street and is not adjacent to mixed use businesses and residential areas.

Negative effect on properties at 21 Gordon Road

We understand that we would still have the benefit of existing use rights under any proposed plan change. The proposed plan change and more restrictive rights under any change of ownership or use will however undermine the underlying asset value of the property and its current flexibility of use. The proposed change will also impact the environment with the potential for additional noise, dust and heavy traffic movements close to existing businesses and residences.

The proposed plan change to General Industrial zoning will have a negative impact on Salmond Architecture and other similar businesses established in the current zone as well as on the owners of the property. The ability to live and work in the same building is what was intended by this development and this flexibility adds value to the property and demonstrates the benefits to small businesses of mixed use development.

The number of existing businesses in the area that would no longer comply if the zoning is changed is significant. The proposed plan change is not consistent with the current usage.

This could be addressed by leaving the current zoning or adjusting the proposed boundary to the industrial area to exclude the existing developments in Gordon Road, and rezoning them as business mixed use.

Communication, consultation and notification

We acknowledge that the proposed plan change was publicly notified, however the notification process was not sufficiently clear as to the potential impact. We have not been contacted directly by QLDC to advise us of the effects of the proposed plan change on our property or business. Had we been made aware of the implications of the proposed General Industrial zone change we would have made a formal submission against the proposed plan change.

This could be addressed by consultation with the existing business community in the area affected by the proposed zone change to produce a finer grain of zoning that allows the existing uses to continue and identifies the most appropriate use for the undeveloped land.

Thank you for the opportunity to support the submissions AGAINST Stage 3 Proposed District Plan change affecting our property at 21 Gordon Road.

Anne Salmond
Registered Architect

s a l m o n d a r c h i t e c t u r e l t d

21 Gordon Road, Unit M, - P O Box 470 Wanaka
03 443 4546 mobile 027 447 4055

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Stage 3 of the
Proposed District Plan

LETTER IN SUPPORT OF SUBMISSION BY TUSSOCK RISE LTD: STREAM 17 : GIZ

29 MAY 2020

**LETTER BY JS BEATTIE
APARTMENT M
21 GORDON ROAD
WANAKA**

I write in support of the submission by Tussock Rise Ltd.

My name is John Beattie. Along with my wife Anne Salmond who has written separately I am a custodial tenant of Apartment M at 21 Gordon Road.

Apartment M is one of 14 units in the 21 Gordon Road development. My wife is Chair of the Body Corporate that governs 21 Gordon Road. Apartment M is owned by a family trust and Anne is the Settlor of that trust.

We have lived in Wanaka for more than 19 years and are active members of the community.

We were completely unaware of the GIZ proposal until contacted by the directors of Tussock Rise Ltd last Friday 22 May. They are the owners of the imposing and adjacent greenfield site whose land is some 3 metres above the height of the ground floor entry to each unit.

Since being contacted we have checked with as many of the other owners as was possible in the time frame available and none were aware of the PDP consequences. We like to consider that we are well informed members of our local community but the lack of notice we received has completely blindsided us. I know that the QLDC is only required to advertise its proposed plan changes but the lack of individual notification in this case has created a goodwill issue for the future with the Gordon Road community.

Since we were contacted I have spent the available time reading the evidence of Natalie Hampson (281 pages), the BCDA report from Market Economics (221 pages) including the March 2020 update and the Section 42A Report of Luke Place (173 pages).

Had we been reasonably notified I would have submitted on a detailed basis. Now I am limited to appending this letter to the Tussock Rise submission.

My letter focusses on three core matters:

- 1) The QLD Economic Futures Model and the data fed into it must be revisited before a proposed district plan can be legitimately and logically agreed. The impact of COVID 19 being a 1 in 100 year event forces planners and ratepayers in this environment to revisit first principles, check the robustness of the EFM and carefully assess the data to be inserted into the model. It is too early to carry out the latter while businesses are still in receipt of government financial support. To be clear:
 - No region is more impacted by COVID 19 than QLD with the emphasis on tourism and in particular international tourism.
 - The CEO of Air New Zealand has reported to the NZ Stock Exchange that he expects the airline to be operating at 70% of its pre COVID 19 capacity two years from now. What does the Mayor of QLDC say as to the level of economic activity in the QLDC and in particular in Wanaka two years from now. Not that I would wish to solely rely on the Mayor for future planning but post COVID 19 a formal review needs to inform our modelling and planning from hereon.

- Employment projections are the key input to the demand modelling. Market Economics amended report on the BCDA could not have been more poorly timed (March 2020) just prior to lockdown. Fortunately an updated 3 year BCDA is due at the end of this year and this will be critical to put tension on the assumptions in the previous exercise(s) which insofar as population projections are concerned were carried out in October 2018.
 - The EFM adopted “high” economic growth rates. We should now pause, look at what we are trying to measure and see if the model is still robust and then later in the year adopt growth rates which are informed by measuring the new environment we are in.
 - It is a brave Panel that will wish to hear submissions from all parties particularly including QLDC specialists that are based on pre COVID data and assumptions.
- 2) The second matter I wish to raise is that I have limited faith in the accuracy of the “groundtruthing “ carried out by Market Economics. To be clear I am not challenging the integrity of the work done by Natalie Hampson and her colleagues. Rather I am questioning the Field Survey Data process carried out by QLDC employees.
- With the very limited time (less than 5 days) I have had to look at the data and characterisation of businesses in Gordon Road and doing some groundtruthing myself I find I am at odds with the information set out in page 97 of Natalie Hampson’s evidence. There are 5 businesses not identified that exist and would have been present at the time of the Field Survey. One is possibly debatable but the other 4 are not. That is a 25% variance with the data supplied to Market Economics. I ask if it only took me a brief time to identify a genuine tension on the quality of data supplied to Market Economics then what else might be disclosed upon a closer inspection.
 - The whole manner in which field survey data is collected and then used by council and third party advisor specialists must be queried. I would seek evidence to the Panel as to the quality of the data collected by requiring the Council Manager in charge of the survey and collection process to provide a report about the level of accuracy of what has been captured.
- 3) Following on from my first matter above there is a revealing comment by Natalie Hampson which seems to crisply distil what Luke Place took a lot more text to say. Her observation at page 104 of her evidence was “ *More stringent planning frameworks are needed that avoid too much flexibility in industrial zones so that industrial activities that have a functional need to locate in those zones are protected*”. My observation is that while I don’t disagree in principle with Natalie Hampson I am asking what evidence of industrial activities in Wanaka has been prevented by the current ODS.
- Similarly when debating the benefits of a single industrial zone over the current ODS rules I would not disagree with the fact as Natalie Hampson says that there is some logic in simplifying the Industrial and Industrial B structure. But again I ask what evidence is there of pain to ratepayers with the current classifications? There is none I am aware of but conversely there will be pain to ratepayers in Gordon Road and

elsewhere with a change. If it aint broke then don't look to fix it all in the name of purist planning cant.

Finally an observation based on my business experience in Wellington and Auckland and in particular when I was a manager in NZ's largest investment entity at that time (Brierley Investments) that specialised amongst other things in rationalising industrial entities.

My observation is that the two most significant industrial activities in Ballantyne Road are a transport depot for Upper Clutha Transport and a concrete batching plant operated by Firth Industries. They will inevitably depart the area because of both reverse sensitivity and market pressure issues the latter being more pivotal but the former being the catalyst for a change in management thinking about location.

At Brierley investments we observed transport and concrete businesses moving out of central metropolitan sites to locations on the fringe which left those central metropolitan sites available for redevelopment and thus creation of higher land values. No amount of policy planning however well intended could compete with the market forces to move as a city's boundaries grew.

I suggest that planning for future industrial expansion in Wanaka should realistically include that some of the current major activities will no longer be there because of the inevitable change in values and amenities in the area. I think there is genuine overcapacity for industrial in the planning proposals I have read this last week. I am happy to share my observations of how we rationalised Winstones in Auckland including its departure from a massive area in Mt Wellington and how Certified Concrete left Thorndon a high value residential suburb in Wellington. The same will happen in Wanaka it is inevitable and the reality is the then owners of Firths and Upper Clutha Transport will be delighted with the dividend they receive from the sale of those parcels. They can and will move. It is better to have dialogue along those lines with them now.

Thankyou for the opportunity to make some brief comments.

Don't be imprudent and make important but hurried growth decisions in this post COVID 19 environment. Be cautious and pause with the GIZ proposal as we are in a different environment for the long term about population and employment projections for this region.

John Beattie
jbeattie@xtra.co.nz