

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of the Queenstown Lakes
District Proposed District
Plan, Hearing Stream 02

STATEMENT OF EVIDENCE BY J W P HADLEY

17 May 2016

INTRODUCTION

1 My name is James William Peter Hadley. I am a Trustee of the Trusts which own property at the following locations on Speargrass Flat Road;

-549 Speargrass Flat Road, Lot 1 DP12234 and Lot 3 DP 23930

-509 Speargrass Flat Road, Lot 2 DP447353

-505 Speargrass Flat Road, Lot 1 DP447353

2 I live with my family at the property located at 509 Speargrass Flat Road and have lived in the Wakatipu Basin for the last 20 years.

3 Through my work as a professional engineer I have been involved with, and have had significant exposure to, numerous local development projects. Over time and through the course of this work I have developed an academic interest in the land use patterns which have evolved in the Wakatipu Basin as a whole.

MY SUBMISSIONS

4 I have made an Original Submission and a Further Submission regarding Chapter 21 of the Proposed District Plan (PDP), Rural. My evidence today should be read in conjunction with my original submission, number 675 and my further submission, number 1086. My brief evidence today principally disagrees with submission 430 from Ayrburn Farm Estate Ltd (Ayrburn) and in most part with the pre-lodged evidence of Ayrburn's experts.

5 Ayrburn submit and request the following;

-that growth must be accommodated in all sectors.

-that growth will inevitably effect landscape values.

-that the PDP over-emphasises the importance of farming activities.

-that other activities that require a rural location, such as rural living and visitor activities, should also be enabled and should be on at least an equal footing with farming.

- 6 Based on the above, submission 430 goes on to suggest alterations to the provisions of the Rural Zone (Chapter 21 of the PDP). The suggested alterations generally seek to give *“other activities that require a rural location”* the same status as farming.
- 7 The difficulty with this suggestion is that the effects of farming activities in terms of landscape, nature conservation, soil, water and amenity are generally known, predictable and appropriate in terms of the rural resources and landscapes of the District. That is why farming activities have always been permitted activities. However, *“other activities that require a rural location”* are not well defined and are therefore much less predictable. For example, Activities that require a rural location include such things as rural restaurants, paintball, bungy and zorb ball operations, wedding reception venues, motor racing activities and wind farms. These things cannot be built in urban areas; they require a rural location, but clearly they should not be enabled in the same way or to the same degree that farming is; - they are much more likely to adversely affect landscape character and visual amenity.
- 8 I accept that the District Plan should not merely prescribe farming and nothing else for the Rural Zone. However, it is very important to recognise that the form of landscape character that the rural lands of the District display, has come about through traditional rural land uses. This form of landscape character is obviously a very important resource for our District, underpinning the desirability of our District as a tourist destination and a living location. Additionally, I accept that traditional rural activities other than farming, such as forestry, mining, viticulture, rural recreation activities (tramping, hunting, fishing, etc), should be provided for similarly to farming. However, I consider that it would be a very significant change for this District (and one that considerably alters much of its landscape character) if **any** activity that requires a rural location is enabled in the Rural Zone in the same way that farming traditionally has been.
- 9 I also present the hypothesis that placing *“other activities that require a rural location”* on the same footing as farming activities neglects the benefit

provided by farming and rural activities to other living areas in terms of diversity and differentiation of living environments and in doing so, risks inappropriate development and loss of character.

- 10 I have identified that farming activities provide benefits to other living areas and also landscape benefits by clearly differentiating the living environments of the other living areas. Consequently, it makes sense that the farming activity needs to be prioritised in some way because of the inverse benefits it provides through this differentiation of living environments and character. Currently this "prioritisation" is achieved by making farming and farming activities in rural areas Permitted and other activities Controlled or Discretionary or Non-complying. The status quo in the plan is therefore an efficient way of reinforcing and providing for farming activities in the Rural Zone so that the open space benefits which are afforded to other settlement or living areas is acknowledged in some way, and encouraged. Short of offering monetary subsidy to rural or farming landowners this is presently the only tool available to recognise the benefits afforded to the other living areas by farming activities.
- 11 Reinforcing this view, I have recently spent a significant period of time in Switzerland where I observed the prevailing land use patterns. Switzerland is a country where the settlement pattern is dictated to by geographic and landscape constraints. It is obvious that the principle of maintaining and protecting open space between settlements (often with rare, flat pasture or rural grazing areas) has been prioritised to help reinforce, differentiate and support the type of dense living that is desired and which occurs in the settlements themselves. At a micro scale, the geographic and landscape constraints in the District are not dissimilar and there are some parallels which can be drawn with the land use management approach which I observed in Switzerland. For example, it is very clear that the urbanised living styles of the settlements are reinforced by their open space surrounds and open space activities. A "joining" of these settlements through removal of open space separation potentially destabilises the success of the urbanised living areas themselves. I submit that this an aspect worthy of consideration in a PDP context.

- 12 Turning my hypothesis around the other way - I think "the counterfactual" is the term favoured by those in the finance industry - if there is no differentiation of rural land and farming activities (as is promoted by Ayrburn) then the benefits of open space in an urban design sense are lost. Also lost are the social benefits of the rural, farming and open space areas reinforcing the living differences and therefore diversity of the other living styles or zones. Consequently, if we proceed as promoted by Ayrburn and their experts, there is a high risk that everything will become very "vanilla" in a living sense, and this is separate to any landscape arguments. This will have a flow on effect to the identity of existing living areas and indeed to what might be described as the cumulative character across the District. This is particularly relevant to how visitors might perceive the character of the District as a whole, and how this might change with time under the Ayrburn regime.
- 13 Taking the counterfactual case further, if the "other activities" that require a rural location are developed throughout the District on what was once rural land, then the rural character that these activities desire will soon be diminished to a level that provides no value and no utility to the desired activity. For example, in paragraph 2 of his pre-lodged evidence, Mr Baxter refers to the views from Speargrass Flat Road as follows;

The drive along Speargrass Flat Road, by way of example, takes the viewer along open pastoral views, hedged developments and glimpses towards dwellings set back from the road. These together form the existing patterns of the rural landscape in the Wakatipu Basin. They are not a detrimental component of the rural landscape, they are an expected and valued part of that landscape.

I have presumed that Mr Baxter refers to the eastern end of Speargrass Flat Road between Lower Shotover Road and Lake Hayes Arrowtown Road, as views are limited at the western end by mature hawthorn hedges and dense tree planting. The majority of the land in the views which Mr Baxter refers to is zoned Rural, thus providing a balance of open vistas to the hedges and trees that surround some houses in the rural living areas that are partly visible. This view would be very different, and significantly

less valued, if commercial recreation activities were located within the open paddocks.

- 14 Similarly, residential development throughout the majority of the rural land cited by Mr Baxter would also change these views as over time the rural character would be more and more diluted from both inside and outside the developments. Once land is subdivided the use will change permanently and the rural character that still exists now, is lost. I note that the benefits claimed in Mr Stalker's pre-lodged evidence for Ayrburn Farm of subdivision allowing the maintenance of more elevated Outstanding Natural Landscape are short term only, as the financial benefit of subdivision occurs only once and is not ongoing to future generations.
- 15 I note that residential development, particularly greenfields and development of an urban density, must be located in a balanced manner that efficiently manages infrastructure, transport, education, protection of natural values including ecology and landscape values – and including the protection of rural amenity. Dr Marion Read, in her report "Wakatipu Basin Residential Subdivision Development; Landscape Character Assessment 2014", recommended areas within the Wakatipu Basin that could absorb further residential development and be rezoned Rural Lifestyle. If this recommendation is followed the PDP will already be affording opportunities for further rural living development in the Wakatipu Basin, without the potentially uncontrolled and permitted consumption of rural land by "*other activities that require a rural location*" or for "*accommodation of growth in all sectors*" as is proposed and promoted by Ayrburn and its experts.
- 16 In closing, I believe that the PDP as proposed, and the report of Dr Read, reflects and mitigates the effects of the hypothesis that I have presented and that the PDP as drafted should be adopted in preference to the proposals of submitter 430.