

**BEFORE HEARING COMMISSIONERS
IN QUEENSTOWN | TĀHUNA ROHE**

UNDER THE Resource Management Act 1991 (“**Act**”)

IN THE MATTER OF a variation to Chapter 21 Rural Zone of the Proposed Queenstown Lakes District Plan, to introduce Priority Area Landscape Schedules 21.22 and 21.23 (**PA Schedules**)

AND IN THE MATTER OF a submission on the PA Schedules

BETWEEN **THE CARDRONA CATTLE COMPANY LIMITED**
Submitter

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**
Planning authority

STATEMENT OF EVIDENCE OF DAVE HENDERSON

*Before a Hearing Panel: Jane Taylor (Chair),
Commissioner Peter Kensington and Councillor Quentin Smith*

Introduction

1. My name My full name is David Ian Henderson. Most people call me Dave.
2. I am the developer of much of the landholding comprising the “Victoria Flats”. I confirm that I am authorised to give this evidence on behalf of the appellant company, the Cardrona Cattle Company Limited (**CCCL**). I will generally use “I” or “we” when giving evidence encompassing both myself and/ or CCCL.
3. I have had a relationship with the site for over 20 years and acquired the site in early 2018. I know the Queenstown region very well.
4. I give this evidence both as a developer, but also as a passionate resident of the district. I am part of the community, and I understand that the community’s views are an important part of informing the landscape values of a particular landscape. I also understand that a District Plan is supposed to be “the community’s plan”, arrived at through a public participatory

process. In other words, it is not the domain solely of experts, although it appears to me that decision-making based on opinions from experts outside the community is rife.

5. It is for this reason that I am giving this evidence, particularly as I have now read – briefly in the time available – the relevant joint witness statements. I must say, they rely on a minefield of detail in the schedules (which didn't seem to be attached), and don't speak to the real world views of the community, or any normal person, on the ground.
6. I want to the Panel to hear from the community that will bear the brunt of its decisions, and so have prepared this short statement accordingly.
7. CCCL has also provided evidence from a landscape architect and a planner, and I do not wish to diminish their importance.
8. However, I fail to see how any normal, ordinary person, of right mind, could find that the *Flats* is an outstanding natural landscape. This area is highly modified, has a variety of non-natural uses occurring or consented, and is far from "outstanding" in any visual or other way. It would be a travesty to have the Flats included in the landscape schedules and treated as an outstanding natural landscape, as it this would risk blighting the use of the land for the rural-industrial, recycling, and other uses that we wish to put there, that the district is crying out for.

More detailed comments

9. The site at Victoria Flats is highly modified. You should see it for yourselves. It has historically been regarded as a rumpy piece of land between Gibbston Valley and the Waitiri peninsula.
10. The area has become defined by the region's landfill. This has an economic life of at least another 40 years. It will dominate these flats for that time, at least.
11. In addition, the following are now present in Victoria Flats:
 - (a) a large quarry;
 - (b) stone & gravels processing;
 - (c) stone & gravels retailing;
 - (d) an asphalt plant;
 - (e) a gun club;

- (f) the oxbow facility (speed boats, shooting range, 4wd treks); and
 - (g) Nevis Bungy.
12. That the Victoria Flats is zoned Gibbston Character Zone (**GCZ**) is an aberration. It will never, and probably can never, be utilised for grape growing and related viticulture activities.
 13. We have had to fight, and are continuing to fight, the Council's District Plan team tooth and nail, for a rezoning of the site, that will enable the reasonable use of land given its location and characteristics.
 14. As I understand it, under the Plan, the GCZ is not an ONL. So it defies logic that the Victoria Flats land would then be included in the Landscape Schedules. In addition to all the other difficulties (economic as well as planning) we have for developing, this will present a conundrum to processing officers and decision-makers when considering our resource consent applications. If we are discretionary or non-complying, then how do they ignore the identification of the Flats within the maps to which the Schedules relate? It creates room for unnecessary debate, all at significant cost and uncertainty.
 15. I now have a number of resource consents for the site, including what I am told is an urban development of a storage facility. Surely this should be recorded as an attribute of the land now.
 16. I also note that the only part of the Flats that is visible to the community and visitors is essentially all that land that is the strips adjacent to the State Highway. They are an eyesore. I have tried unsuccessfully, but enthusiastically, to see a comprehensive and appropriate landscape solution be applied to these strips. There are in total five landowners. I have four of them in agreement and keen to effect such a solution. The only hold out is in fact the QLDC itself who have so far refused to engage. If, as a community, we are keen to create the best possible experience for anyone driving through the Victoria Flats then this approach is the only practical solution.
 17. I look forward to speaking to these issues further at the hearing.

13 October 2023

Dave Henderson