

**Before the Hearing Commissioners
at Queenstown**

In the Matter of

the Resource Management Act
1991

And

In the Matter of

a proposed variation to the
Queenstown Lakes Proposed
District Plan – Te Pūtahi Ladies Mile

**Statement of Evidence of
Alex John Dunn
for Doolytle & Son Limited**

Dated: 20 October 2023

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INTRODUCTION

Qualifications and Experience

1. My name is Alex John Dunn.
2. I hold the qualification of Bachelor of Environmental Management and Planning from Lincoln University and have eight years' experience as a planner.
3. I have previously worked for Westland District Council from 2014 to 2016 and for Queenstown Lakes District Council (QLDC) from 2017 to 2021. During this period, I was predominantly employed as a Planner, processing variety of land use and subdivision consents on behalf of Council. I also held the role of Team Leader for Subdivision and Development Contributions from 2019 to 2021 at QLDC.
4. Since July 2021, I have been employed by Southern Planning Group Limited. In this role, I have been responsible for applying for a number of land use and subdivision consents. I also consult to QLDC assisting with the processing of s223 and s224c subdivision applications.
5. Throughout my professional career I have attended a number of hearings, both as the s42a Council Officer and as a planning expert for applicants.
6. I have been an Associate Member of the New Zealand Planning Institute since 2014.

Code of Conduct

7. While this is not an Environment Court hearing, I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. This evidence is within my area of expertise, except where I state that I am relying on material produced by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

SCOPE OF EVIDENCE

8. My evidence will deal with the following:
 - (a) background;
 - (b) statutory framework;
 - (c) rezoning relief sought;
 - (d) planning assessment;

- (e) response to Council Report; and
- (f) conclusion.

EXECUTIVE SUMMARY

9. This evidence outlines the relief sought; which would apply to Commercial Precinct Zoning to the Doolytle site.
10. In the event that Commercial Precinct Zoning is not accepted, High Density Residential (HDR) Zoning as per the current Proposed District Plan (PDP) provisions is sought for the Doolytle site.
11. Enabling Commercial Precinct Zoning of the site will ensure that a proper Town Centre environment is formed in the future, which would encompass both sides of the Highway.
12. It is important to consider and recognise the existing urban area of Lakes Hayes Estate and Shotover Country. These existing urban areas do not have many commercial services available that can be accessed by way of active transport (walking and cycling).
13. The establishment of Commercial Precinct Zoning on the southern side of the highway will provide access to further commercial services to existing communities and complement the expanding Eastern Access Corridor. With the projected increase to the existing Queenstown urban areas and the Southern Corridor, it is important to ensure that planning where commercial activities can be located, including large format retail, is not short sighted.
14. The site subject to this Evidence has good and safe connections to transport infrastructure; both vehicular and active.
15. The rezoning of the site will decrease greenhouse gas emissions as there will be less vehicular trips required by existing residents within the Lake Hayes Estate and Shotover Country areas.
16. The proposed rezoning to Commercial Precinct will give effect to the overarching objectives and policies of the Zone to ensure it is self-sustaining.

BACKGROUND

17. I have been asked by Doolytle & Son Limited (**Doolytle**) to provide evidence on the Te Pūtahi Ladies Mile (**TPLM**) Variation (**Variation**) to the Queenstown Lakes District Plan.

STATUTORY FRAMEWORK

18. Section 7 of the Council's s42a report sets out sets out the statutory framework for the functions of territorial authorities in meeting the purpose of the Act, for the preparation and content of District Plans, and for changes and variations, to plans. I agree with Council's summary of the statutory framework.
19. Section 32 is of particular importance to the proposed Variation. This section sets out the relevant statutory tests that must be carried out to determine the most appropriate way to achieve the purpose of the Act.
20. Section 32(1)(b) requires an examination whether the provisions of the proposal are the most appropriate way to achieve the objectives.
21. Section 32(2) requires that an assessment under subsection (1)(b)(ii) must identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions.
22. My assessment below has considered the requirements of s32 and provides what I consider the most appropriate response to the objectives to achieve the outcomes sought by Doolytle, as well as what the Variation seeks to achieve.
23. In carrying on that assessment, when determining the relevant objectives of the variation I have relied on both the proposed provisions, and also the background assessment prepared by Council in support of the variation.

REZONING RELIEF SOUGHT

Doolytle & Son Limited

24. Doolytle lodged a submission on the variation. I drafted the submission. The proposed zone as notified in the Variation for the Doolytle land at Lot 2 DP 536321 is Lower Density Suburban Residential Zone (**LDSRZ**). Doolytle's adjacent Lot 403 DP 322452 was not included in the Variation as notified.
25. Doolytle seeks that its land be rezoned to TPLM – Commercial Precinct. It also seeks that its adjacent Lot 403 DP 322452 be included in the variation and also zoned TPLM – Commercial Precinct.
26. In support of this, Doolytle also seeks amendments to the following provisions:
 - (a) Policy 49.2.3.2 be amended to remove the 'avoid' directive in regard to establishing business activities such as industrial, service, large format

retail activities and large office spaces and instead 'manage' the introduction of those activities.

- (b) that Proposed Rule 49.4.14 be amended to not restrict Large Format Retail to only grocery and supermarket stores but allow all large format retail on the Doolytle site;
 - (c) that Proposed Rule 49.5.38.1 which restricts the maximum retail floor area to 300m² for a single tenancy be removed;
 - (d) that Proposed Rule 49.5.38.2 which restricts the one large format tenancy within the Plan Change area to 2000m² be removed from the Doolytle site; and
 - (e) A new specific rule, 49.5.41.5 is proposed to allow for a maximum height of 12 metres for buildings on Lot 2 DP 536321 and Lot 403 DP 322452.
27. Details of the amendments to provisions sought are attached in **Annexure A**.
28. If a TPLM – Commercial Precinct zoning is not accepted, Doolytle seeks a zoning of the Proposed District Plan (PDP) High Density Residential Zone.

SECTION 32AA PLANNING ASSESSMENT

Appropriateness of TPLM – Commercial Precinct Zoning

29. The TPLM Final Masterplan report¹ contains design responses which have been incorporated into the notified version of the TPLM. Of note, Doolytle's site is specifically identified as a 'developable area' which is in close proximity to the community heart. Doolytle's site is also readily serviced by public transport connections and is in close proximity to existing walking/cycling trails, which are proposed to connect north via (or adjacent to) the Doolytle site.
30. Design Principle 4 of the TPLM Final Masterplan seeks to create self-sustained and connected communities. One way this is achieved is by establishing a community and commercial heart for both existing and new neighbourhoods. The identified Town Centre within the Masterplan is to the north of Doolytle's site on the opposite side of State Highway 6.
31. As identified in the Final Masterplan, it is important that communities are self-sustained. This includes existing communities. Currently, there are limited commercial offerings within the surrounding area. There are some commercial

¹ Appendix A to the Section 32 Report

activities on the Queenstown Country Club's land (known as Kawarau Park). However, this commercial area has now finished being constructed and while it is a benefit to this existing community that some commercial services are available, the amount of commercial services offered are restricted. I consider that Kawarau Park will exist as an island of commercial activities disconnected from the commercial precinct.

32. While I do not consider that in isolation a commercial precinct over the Doolytle's land will result in the existing community being self-sustained, I do consider that any additional land added to the commercial precinct will expand both the range of commercial services available which in turn, will contribute to less persons having to leave the existing urban areas to access some services, but also provide a corridor of commercial activity to connect the variation land with the existing communities of Shotover Country and Lake Hayes Estate.
33. The existing and proposed as notified lack of commercial zoning in this area will result in a high use of private vehicles still being used to access commercial services on the western side of the Shotover Bridge which will continue to exacerbate issues relating to greenhouse gas emissions. A draft Greenhouse Gas Emissions assessment has been prepared by LUMEN and this is attached as **Annexure B**.
34. Locating commercial zoning on the southern side of the highway will likely result in a greater proportion of active travel modes and therefore lower emissions will be produced. The Doolytle site is in close proximity to existing pedestrian connections. If commercial precinct zoning was applied to the site, connections could easily be made to the site. In turn, this would reduce the total commuting emissions within the wider Queenstown area.
35. The LUMEN report conservatively estimates that additional commercial zoning on the southern side of Ladies Mile would result in 50 less passenger trips out of Lake Hayes Estate and Shotover Country per day. Over a period of a year, this would result in 282,875 kilometres of travel being avoided which equates to avoided emissions of 71,284 kg CO₂-e.
36. The LUMEN report acknowledges that that while some commercial precinct zoning is proposed on the northern side of the highway, the distance of this zoning away from the existing urban areas on the southern side of the highway will likely result in these residents utilising private vehicles to access these commercial services. Therefore, while emissions may be less, as persons will still be using vehicles to access this northern commercial area, emissions will not be avoided completely.
37. Access to the site is able to be achieved from Howards Drive. Potential access locations are shown on plans prepared by Aurum attached as **Annexure C**. These

plans show that safe, efficient vehicular and pedestrian access is able to be provided to the site to support commercial precinct zoning.

38. Allowing commercial precinct zoning on the southern side of the highway will provide benefits to the existing residents within Lake Hayes Estate and Shotover Country. While the Masterplan does indicate a 'Crossing Curtilage' overlay area where it is proposed a pedestrian crossing will be established across the highway, this crossing point may not be established for several years if the Plan Change is approved.
39. Commercial Precinct zoning on the Doolytle site will provide residents with accessible commercial activities that can be safely accessed without having to cross to the opposite side of the highway.
40. The notified provisions only provide for relatively small-scale neighbourhood-type shops in one node of commercial area. As notified, the majority of residents will still need to access existing commercial areas within Frankton for their commercial servicing needs.
41. I have given specific consideration to the Commercial Precinct Zoning in the notified (and modified through the s42a) Objectives and Policies of the zone.
42. Proposed Objective 49.2.3 states:

The Commercial Precinct is compact, convenient and accessible for meeting the needs of local residents.
43. The wider Ladies Mile area is being comprehensively planned to essentially be a mixed-use neighbourhood. This is not how the existing urban area of Lake Hayes Estate or Shotover Country were designed. The rezoning of Doolytle land will ensure that commercial services are in closer proximity to the existing residential activity and better integrate with these existing suburbs.
44. If the commercial area were to be extended to include the Doolytle land, the Commercial Precinct would essentially become a commercial corridor. The notified commercial area would remain intact should the Doolytle site be rezoned. The extended commercial corridor would be convenient and accessible for the needs of local residents and the Doolytle land would be pivotal for that.
45. I consider the rezoning to be consistent with Objective 49.2.3 and its associated policies.
46. Proposed Objective 49.2.6 states:

Development in the Zone minimises the generation of additional vehicle trips along State Highway 6, and reduces, as far as practicable, vehicle trips along State Highway 6 generated by the adjoining residential areas at Ladies Mile.

47. Providing for additional commercial land, in what will become a corridor of commercial development extending from the notified Commercial Precinct area to the southern portion of the Queenstown Country Club land, will enable and encourage a range of commercial activities. The more commercial services offered on the eastern side of the Shotover Bridge, the less residents should need to access Frankton for some commercial services and thus, reduces vehicle trips along State Highway 6.
48. Associated Policy 49.2.6.1 encourages the provision of commercial activities that serve the day-to-day needs of the Ladies Mile communities.
49. This Policy is considered to be particularly relevant as the existing communities on the southern side of Ladies Mile do not have the existing provision for day-to-day needs. The existing population of the Lake Hayes urban area and Shotover Country are reliant on Frankton to access their commercial day to day needs. While there are some limited services available on the Queenstown Country Club land, I do not consider these existing services to meet the day to day needs of these existing communities.
50. I accept that establishing a further area for commercial activities may not fully meet the residents' essential "day to day" needs, but rezoning the land to provide for commercial purposes will increase the amount and variety of commercial services available in the area. Additional commercial options will naturally result in less traffic from the eastern side of the Shotover River if a number of varying commercial services become established.
51. In addition, the variation is proposing that only a single supermarket will be established within the notified commercial precinct. This has the potential to restrict competition and the timing of any supermarket is unclear, as this is reliant on one landowner confirming to the structure plan and selling land to a supermarket company.
52. Flexibility should be encouraged and extending the commercial precinct area, to create a commercial corridor, will provide greater flexibility and options to a future supermarket(s). I therefore consider the rezoning to be consistent with Objective 49.2.6 and its associated policies.
53. Objective 49.2.7 and its associated (relevant) policies state the following:

Objective 49.2.7: *“An attractive built environment that positively responds to streets and open spaces, provides a high level of residential and neighbourhood amenity, achieves high quality urban design and ecological outcomes and incorporates indigenous biodiversity in design.”;*

Objective 49.2.7.1: *“Encourage building design that integrates with public spaces and provides for a pedestrian-friendly environment including active street frontages.”;*

Objective 49.2.7.2: *“Minimise opportunities for criminal activity through incorporating Crime Prevention Through Environmental Design (CPTED) principles as appropriate in the design of building layout, public and semi-public spaces, and landscaping.”;*

Objective 49.2.7.3: *“Acknowledge and celebrate the area’s cultural heritage, including incorporating indigenous vegetation and reference to tangata whenua Manawhenua values, in the design of public and private spaces, where appropriate.”;*

Objective 49.2.7.4: *“Ensure that the location and direction of lights does not cause significant glare to other sites, roads, and public places and promote lighting design that mitigates adverse effects on views of the night sky.”;* and

Objective 49.2.7.5: *“Ensure that outdoor storage areas and any carparking areas are appropriately located and or screened to limit adverse visual effects and to be consistent with the amenity values of the Zone or those of any adjacent zone.”*

54. I consider this Objective is relevant to both the Variation in terms of the appropriate location of various activities, and also at future resource consenting stages. Any commercial development of the Doolittle site will be subject to this Objective and associated policies with any building design likely being subject to an urban design review. I consider the rezoning of the site would result in a high-quality commercial environment that would be able to be designed in such a way that it integrated with public space. This could be achieved by providing public pedestrian easements through the site, implementing building setbacks and additional landscaping between the Open Space Activity area and any commercial development.
55. I consider that the rezoning of the land will also have positive effects as it will provide additional land for commercial development. This is a more efficient use of land on a site that is centrally located within the wider Ladies Mile area.
56. Positive effects arising from the rezoning would include a centrally-located corridor of commercial development from the notified precinct area, through and past the Doolittle land, and onward to Kawarau Park. This will achieve objective 49.2.1 that seeks interaction with existing urban development.

57. Effects are able to be internalised. This can be achieved by extensive landscaping around near the road boundary and ensuring design controls are complied with. Ultimately, I consider commercial use of the land will provide a more appropriate amenity outcome at a local level than low density residential will.

Appropriateness of Large Format Retail (in addition to other commercial activities) on the Doolytle Site

58. I consider that non-supermarket large format retail would also be an appropriate use of the Doolytle site.
59. With regard to potential effects on the adjacent Open Space Activity area, I consider that any large format retail could be absorbed into the site. Large Format Retail adjacent to sports fields are not uncommon. There are several Large Format Retail stores directly adjacent to the sports grounds at the Queenstown Events Centre. Setbacks and landscaping can soften built form related to Large Format Retail.
60. The objectives and policies for the TPLM Zone discourage large format retail, with the exception of one single grocery store or supermarket.
61. However, the objectives and policies also seek to provide for a self-sustaining community. For a community to be truly self-sustaining, I consider that more than one large format retail store is required. While I agree that a supermarket does provide an 'anchor' to a complex, so do other non-supermarket large format retail. For example, K Mart anchors the Queenstown Central Complex. Therefore, if no supermarket was to establish on the Doolytle land, I consider it possible that in addition to smaller format retail, another large format retail store could provide an anchor tenancy on this land.
62. Any commercial zoning of the land will provide additional commercial services to the existing residents of the Lake Hayes Estate and Shotover Country urban areas which will decrease reliance on the regular use of private vehicles. This in turn would support the government's goal to reduce kilometres travelling by light vehicle fleets by 20% by 2035.
63. Low Density Residential zoning of the land would be fragmented from other residential activity in the surrounding area by virtue of the Open Space Precinct to the north and east. To the south, there is an escarpment which provides a topographical barrier between the Doolytle land and the low-density zoning of the wider Lake Hayes Estate urban area. To the east is the Queenstown Country Club retirement village and the Kawarau Park commercial area.

64. In conclusion, as the Doolytle land is not surrounded by standard low density residential activity, I consider that the site is able to support large format retail activities that would service the existing urban area and the wider Eastern Access Corridor as this area develops into the future.

Planning Documents/Higher Order Direction

65. The QLDC Proposed District Plan (**PDP**) contains higher order objectives and policies relevant to consideration of the variation. These are contained within Chapters 3 and 4.

Chapter 3 – Strategic Direction

66. Strategic Objective 3.3.4 states:

Avoid new commercial zoning of land that is likely to undermine the role of the Queenstown and Wānaka town centres as the primary focus for the District's economic activity.

67. Queenstown and Wanaka town centres will continue to serve as the primary focus for the District's economic activity. Commercial zoning of the Doolytle land will support an increased population of the Eastern Corridor. In addition, the rezoning would reduce traffic movements and allow the existing Queenstown Town Centre freeing this area up for primary economic activity. I consider the rezoning to be consistent with this objective.

68. Strategic Objective 3.3.7 states:

Avoid additional commercial zoning that is likely to undermine the function and viability of the Frankton commercial areas as the key service centre for the Wakatipu Basin, or which will undermine increasing integration between those areas and the industrial and residential areas of Frankton.

69. As the population of the Eastern and Southern Corridors grow in the future, forward consideration needs to be given to other areas that can accommodate commercial activities, including large format retail. The rezoning of Doolytle's land will not result in a sufficiently large area of land being zoned for this purpose. Frankton will remain the key service centre. I consider the proposed rezoning to be consistent with this objective.

70. Strategic objective 3.3.11 states:

Avoid commercial rezoning that is likely to undermine the key local service and employment function role that the centres outside of the Queenstown and Wānaka town centres, Frankton and Three Parks fulfil.

71. The establishment of the proposed TPLM zone will create a new residential environment. One of the overarching directives of the TPLM is that the community on the eastern side of the Shotover Bridge is to be self-sustaining. To be self-sustaining, sufficient land must be provided to enable a range of commercial activities with a variety of floor areas. In addition to this, the existing Lake Hayes Estate and Shotover Country urban areas have limited local services. Doolytle's land will not undermine Frankton if it is rezoned for commercial purposes. The overall area of the land is small compared to commercially zoned land at Frankton. I consider the proposal to be consistent with this objective.

72. Strategic objective 3.3.12 states:

Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.

73. Doolytle's land will provide for the growth of commercial services within the Eastern Corridor. As the population and the catchment of this corridor grows, so will demand for commercial land that is of sufficient size for development. I consider the proposal to be consistent with this objective.

74. Strategic objective 3.3.15 states:

Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs

75. Given the modest site of the Doolytle land, I do not consider it is possible that activity could take place to a level that would undermine the role that the commercial areas fulfil.

Chapter 4 – Urban Development

76. The Site is identified as an “indicative future expansion area” within the Queenstown Lakes District Urban Environment Map contained within this chapter.

77. While this chapter predominantly deals with plan making itself, it is clear that the Site has been marked for future inclusion within the urban growth boundary. While the proposal is not urban in nature as the zoning of the Site has not yet changed to urban, I consider the development of the Site proposed by way of this variation appropriate.

PART 2

Assessment Against Part 2

Section 5

78. The purpose of the Act as stated in s5(1) is “to promote the sustainable management of natural and physical resources”.

79. Section 5 (2) of the Act defines “sustainable management” as:

... managing the use, development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well being and for their healthy and safety while –

a) Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and

b) Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and

c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment

80. As detailed throughout my evidence, I consider that commercial use of the Doolittle land represents a more appropriate use for development land than the proposed low density zoning.

81. The relief supported in my evidence is considered to represent sustainable management where adverse effects on the environment have been appropriately mitigated whilst providing for the social, cultural and economic wellbeing of the community.

Section 6

82. Section 6 relates to matters of national importance. Of specific relevance to the subject application are:

(b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development; and

(h) the management of significant natural hazards

83. These matters have been addressed above in detail and the proposal is considered to be consistent with Section 6 matters.

Section 7

84. Section 7 relates to ‘other matters’. The matters of relevance are considered to be as follows:

(b) the efficient use and development of natural and physical resources

(c) the maintenance and enhancement of amenity values

(f) the maintenance and enhancement of the quality of the environment

85. These matters have also been assessed above in detail and the proposal is considered to be consistent with the relevant matters of Section 7.

Section 8

86. In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi. The proposal is not considered to be at odds with the principles of the Treaty of Waitangi.
87. Consequently, taking the assessment contained within this report into account, the proposal is considered to achieve Part 2 of the Act.

Section 32AA Assessment

88. I have undertaken an assessment of the proposed rezoning against the relevant statutory context, in the preceding sections.
89. After undertaking these assessments, I have found that the proposed rezoning sought by Doolittle better achieves the relevant planning provisions and the purpose of the Act than the version supported in the S42A report.

RESPONSE TO COUNCIL S42A REPORT

Submission Out of Scope

90. The Section 42A Report considers the part of the submission seeking the rezoning of Lot 403 to be out of scope.
91. I note the s42a author does agree however that it would be practical to include Lot 403 DP 322452 to be within the Variation to avoid narrow rural zoned piece of land sandwiched between Low Density Residential Zones.
92. As Lot 403 is held in the same Title as the other parcel of land, any resource consent application to development the land held in this Title will have issues from a plan administration point of view and also presents challenges for the owner. These issues and challenges include how to deal with a piece of land that is primarily zoned for productive rural purposes, whether the National Policy Statement for Highly Productive Land (NPS – HPL) would be seriously considered, and the overall activity status of any future consent which would include several technical non-compliances with the Rural Zone.
93. Including Lot 403 to be the same zone as Lot 2 DP 536321 would provide the landowner and Council would certainty of how to treat future resource consent applications.

94. Note that the issue of ability to extend scope by way of submission will be addressed in legal submissions.

Urban Design – Commercial Corridor

95. The s42a author, based on Ms Hampson's evidence, has concerns that rezoning would create another commercial centre in close proximity to others and would compete in the same market and that there is insufficient demand to justify the rezoning. The s42a author also has concerns that spreading commercial zoning over new locations may compromise the ability to develop a viable, compact, and vibrant centre in the notified Commercial Precinct.
96. I consider the proposed rezoning of the land to represent a logical extension to the proposed commercial precinct within the TPLM zone. Rezoning of Doolytle's land will essentially create a commercial corridor that extends from the notified Commercial Precinct Zoning to the existing commercial area within the Queenstown Country Club providing necessary connections from the variation land and existing communities.
97. Likewise, the s42a author considers the alternative relief of HDR Zoning of the site to be out of scope. I do not consider the HDR Zoning request to be out of scope. When land is notified to be part of a plan change, there is scope to request a change in zoning. This is the point of further submissions. Persons who are opposed to rezoning requests have the opportunity through the further submissions process to submit on proposed rezoning requests.
98. The site is unique in the fact that it is elevated over the existing Lake Hayes urban area and that any zoning on the site could be perceived to be a form of 'spot zoning'. Residential zoning of the site in itself could be perceived to be a form of 'spot zoning', as the site does not have a clear relationship with the existing Lake Hayes urban area due to topography.
99. Providing for commercial zoning on the Doolytle land will not compromise a compact commercial precinct within the notified area of the TPLM zone due to the location of the land within a logical corridor of commercial activity. As with any development, the market will respond to demand.
100. Council's Housing Density expert, Ms Susan Fairgey states the following in response to Doolytle's submission:

I consider commercial land uses would disperse the TPLM commercial activity across a larger area and therefore dilute the core commercial centre area that is more appropriately located within the TPLM. I also consider that higher density

residential development may dilute residential intensification from occurring in more appropriate areas around the edges of the commercial centre within the TPLM.

101. I do not consider that the commercial zoning of the site would dilute the commercial core. In fact, it would create a commercial corridor that would extend from the commercial precinct, to the Doolytle land, and onward to Kawarau Park. The rezoning would give effect to the outcomes sought by the QLDC Spatial Plan which identifies this area to be a 'town centre' and would allow the existing neighbouring urban communities, in addition to the new urban communities, to have a high level of self-sustainability which the TPLM seeks to provide. Further, the rezoning would support a reduction in avoided carbon emissions from reduced vehicle movements from the existing Lake Hayes Estate and Shotover Country urban areas which has been calculated to be over 71,000 kg per year carbon dioxide equivalent.
102. With regard to Ms Fairgrey's comments regarding high density development of the site potentially diluting residential intensification from occurring in more appropriate area around the edges of the commercial centre within the TPLM, I consider any potential high density development would have a net overall positive effect on housing typologies, affordability, and numbers. However, I consider a commercial corridor to be more appropriate.
103. Council's expert urban designer, Mr Stu Dun has commented:
- I consider commercial land uses would disperse the TPLM commercial activity across a larger area and therefore dilute the core commercial centre area that is more appropriately located within the TPLM. I also consider that higher density residential development may dilute residential intensification from occurring in more appropriate areas around the edges of the commercial centre within the TPLM.*
- I do not support zoning this land for HDR as this would be inconsistent with the surrounding land use zoning on the south side of SH6. HDR zoning would enable a height limit of up to 24.5m and would have potentially significant visual impact on the adjacent open space of the sports hub. The impact on traffic for a higher residential zoning in this location would also need to be assessed.*
104. The comment regarding the commercial land use of the Doolytle site appears to be considering the TPLM in isolation without regard to the existing urban areas of Lake Hayes Estate and Shotover Country. The rezoning of the Doolytle land to provide for commercial activities will ensure that commercial services are available close to these on this land which will have significant positive benefits for these communities.
105. The existing transportation infrastructure within the area is developed with roading and pedestrian connections that can readily service the Doolytle site. These connections are safe and will support the reduction of carbon emissions from lesser vehicle trips.

106. For completeness, rezoning to current PDP HDR has been sought which provides for a maximum height of 12 metres on flat sites (Rule 9.5.1.1). Under the current HDR provisions, I would not consider that there would be a significant visual impact on the adjacent open space of the sports hub.
107. The Doolittle site provides for a logical extension to the commercial precinct zoning. While there is an area of open space precinct zoning and the State Highway that would bisect the two areas of commercial precinct zoning, the areas would read together as a wider town centre environment to not only the new TPLM community, but also a town centre environment that would service that existing Lake Hayes Estate and Shotover Country communities.
108. I consider that enabling commercial activities to take place on the site is more appropriate than having an island of residential zoning that has no relationship or connections with other land in the vicinity that is zoned as residential.

Economic Effects

109. Another reason the commercial precinct zoning has not been recommended within the s42a is that the rezoning would create another commercial centre in close proximity to others and would compete in the same market.
110. Economic gain and competition is not an effect that can be considered under the RMA. In the event the Doolittle land is not rezoned, the Commercial Precinct as notified may not be successful for many reasons. These reasons include a lack of 'interesting' commercial tenancies, and commercial tenancies that provide services that are not of use to the nearby residents. A lack of 'interesting' or relevant commercial tenancies will be due to the floor area of the tenancies which restricts what type of businesses could feasibly operate within the parameters of the notified zoning. Allowing for more of a variety and expanding the area encompassed by the commercial precinct zoning would allow several different types of commercial services with varying floor sizes to operate in the area. In this case, persons may choose to continue to travel to Frankton to go to the supermarket and complete other shopping at the same time.
111. Queenstown is known for having several different commercial areas that are in close proximity to one another.
112. The proposed rezoning would increase the potential offering of commercial services available on the eastern side of the Shotover Bridge. This in turn assists with ensuring the urban areas (existing and new) on this side of the Shotover Bridge are more self-sustaining. As a result of additional commercial precinct zoning on the southern side of the highway, it is likely that existing residents in these communities

will utilise active modes of transportation to access the site. This in turn will lower overall commuting emissions.

113. The proposed rezoning would allow residents on the southern side of the highway, in well-established urban areas, to access commercial services. This rezoning would therefore have a positive economic effect on these existing residents.
114. Existing commercial centres such as Remarkables Park, Five Mile, Queenstown Central (shopping centre) and the Queenstown CBD itself will not be undermined. As is evident in all commercial centres around Queenstown, there is a high commercial tenancy occupancy rate. Zoning additional land for commercial purposes may, in fact, reduce the price of commercial land. Due to limited availability of commercial land, prices are high. The existing commercial centres will continue to function and develop as the population of the District continues to grow.

Insufficient Demand

115. With thousands of new residents, there is likely to be demand for commercial services that far outstrip the type of commercial activities anticipated within the notified Commercial Precinct. In addition, the notified version of the TPLM zone only provides for the establishment of one large format retail store (being a supermarket). With a catchment of 10,000 persons alone in the Eastern Access Corridor, and thousands of others in Arrowtown (and other area of the Whakatipu Basin), there is likely to be significant demand for land that is zoned for commercial purposes.
116. In addition to the standard resident population, the District at any given time has a high visitor population. Visitors also need to utilise commercial services when they are here. Considering both the permanent residential population and the visitor population are projected to grow in the coming years, I consider there would be demand for additional commercial land.
117. The relevant landowner has spoken to several commercial entities who are seeking commercial land to develop. These entities have all spoken about the struggle to find such land. Much of the existing commercial land that can be developed is located at Five Mile and Frankton and is tightly owned/controlled.
118. In the event that the wider TPLM zone did not proceed, I consider there to be significant demand for commercial land that is closer to both the existing Lake Hayes Estate and Shotover Country residential areas. The existing urban areas support a large population that are required to travel across the Shotover Bridge frequently to access commercial services.
119. The establishment of additional Commercial Precinct zoning on the Doolittle site will reduce carbon emissions and provide existing residents with commercial

services that can readily be accessed by active modes of transportation. The existing transportation infrastructure within the area ensures that the site can be connected to existing pedestrian linkages. For vehicles entering and existing the site, access is readily able to be provided which will ensure there are no adverse transportation impacts.

120. Given the existing active transport and roading infrastructure, the site could establish itself to have commercial activities far in advance of the notified commercial precinct zoning. This would provide immediate benefits to existing residents and the wider environment with a reduction of avoided emissions sooner.
121. In the event that the wider TPLM zone does proceed, I consider the rezoning of the Doolittle land will support a corridor of commercial activities. With expected population and visitor growth, I consider it important that sufficient land is zoned for commercial purposes in areas that currently do not have commercial services close by. The addition of thousands of new residents will naturally generate demand for commercial services.
122. While large format retail (excluding supermarkets) generally do not constitute 'day to day' needs for residents, if other moderate to large commercial services are not available in the area, residents are likely to want to retain private motor vehicles to access these services.
123. Persons that need to drive from the Eastern Corridor area across the Shotover Bridge already demonstrate that there is demand for other commercial services in the area.

Non-Supermarket Large Format Retail Not Supported in TPLM Area

124. The amended s42a Policy 49.2.3.2 states:

Limit the establishment of Service Stations and avoid the establishment of business activities that would undermine the function and role of other centres, including Industrial, Service, Large Format Retail activities and large office spaces.

125. With a combined population of around 10,000 expected in the Eastern Corridor, I consider that restricting non-supermarket large format retail is an oversight that will have the natural result of thousands of people needing to cross the Shotover Bridge to access commercial services. I consider it more appropriate that this Policy be amended to 'manage' the establishment, rather than 'limit'.
126. Ms Hampson's evidence recommends that the floor area for the supermarket be increased to 4000m² as this would allow a supermarket to be full size (as opposed to a 'top up' store). This size of store would allow the supermarket to be a large

anchor store which in turn would better support the viability of other retail and service activity in the proposed centre, and it would greatly improve the probability of changing catchment supermarket shopping (trip) behaviour once established.

127. Like with Five Mile, which has Countdown as one of its anchor tenants, many persons will visit the surrounding shops when they are at the supermarket. This in turn creates an area where persons can complete all their shopping.
128. It appears as though Ms Hampson is encouraging of the same within the commercial precinct within the TPLM zone. That is, persons who visit the supermarket will also patronise the other stores.
129. Ms Hampson's evidence considers the Commercial Precinct to be commercially viable and to have a positive effect on reducing day to day shopping trips that would have occurred west of the Shotover Bridge.
130. Ms Hampson does not support the extension of large format retail stores as no evidence has been provided regarding what store type could be provided for, and the commercial viability of that store (limited to 2000m²) relative to the concentration of large format retail activity already established in Frankton.
131. While there are existing Large Format Retail stores in Frankton, with expected population grown and the overarching themes of the TPLM Zone to ensure the Eastern Access Corridor is more self-sufficient, I do not consider that enough consideration has been given to future residents' needs.
132. While I agree that many large format retailers are not considered to be 'day to day' needs, with growing population to the east of the Shotover River, consideration needs to be given to providing areas for other Large Format Retail activities, as opposed to relying on the established stores in Frankton.
133. With the Southern Corridor (Coneburn Special Housing Area to Homestead Bay) anticipated to rapidly grow in coming years, the existing large format retailers within Frankton will have an increasing number of residents to serve who will live immediately to the south of Frankton.
134. In addition to the Southern Corridor development, Kingston is also expected to develop with the provisions for hundreds of additional residential units in the township. Once developed, Frankton will become a main commercial hub for these residents as well. Frankton also serves as a hub for northern Southland as it is closer to travel to than Invercargill. Consideration should be given to the large catchment of the Frankton Commercial area.

135. QLDC has recently initiated its Intensification Plan Change to enable the number of residential units within existing urban areas to increase by proposing to substantially relax planning rules that can restrict the number of residential units on a residential site. If this Plan Change becomes operative, it significantly increases anticipated residential density – especially to the west of Frankton within the existing Queenstown residential area. An unknown increase in the number of residential units will likely occur, with residents relying on Frankton for the primary shopping needs. However, Council's Expert for Housing Density states in her evidence at paragraph 42 that the proposed Urban Intensification Plan Variation would increase plan enabled capacity by approximately 36% to reach an additional approximately 84,200 urban dwellings.
136. While this is across the entire District, it does provide a snapshot of how many additional dwellings could be established under the Intensification Plan change.
137. The TPLM zoning, as proposed, would result in Frankton essentially being the only 'hub' of large format retail in Queenstown. This will continue to encourage private vehicle use and drive-up emissions. I consider that consideration needs to be given to allowing large format to establish elsewhere with the projected population increases of both the Eastern and Southern corridors in mind, as well as Council's Intensification Plan Change which seeks to enable more dwellings in the existing urban areas of Queenstown.
138. I consider it unnecessarily restrictive for Council to encourage no establishment of non-supermarket related large format retail. I also consider it to be short-sighted considering the proposed increased residential density throughout Queenstown that is being proposed to be current Intensification Variation.
139. Ms Hampson's evidence for Council states that she believes commercial activity on the Doolittle site will compete in the same retail market as locations like Frankton. I do not consider this to be the case. The notified commercial precinct, in combination with the Doolittle land and Kawarau Park will form a commercial corridor. Such a commercial corridor could be seen in a similar way to the Queenstown Town Centre zone with a commercial corridor (in the form of a Business Mixed Use Zone) extending down Gorge Road.
140. Commercial corridors offer more variety of businesses and general commercial offerings. The establishment of larger commercial business on the Doolittle site will ensure that the Eastern Corridor has a defined commercial hub for years to come; as opposed to one large supermarket with several smaller retail tenancies being anchored to the supermarket.

141. Further, there is nothing to suggest that a supermarket may not establish on the Doolytle land. A supermarket on this land could also be surrounded by smaller retail tenancies. Limiting the location of the supermarket to one area (with one landowner) decreases competition. Council's economic evidence seems primarily concerned that there will not be the demand for additional commercial land, or indeed another supermarket. Zoning this land for commercial purposes will encourage competition between large format retail stores. Despite Council's economic evidence, it is clear no large format retail store would establish without an independent economic assessment to determine whether demand exists for such an activity or not.
142. I consider effects associated with allowing non-supermarket large format retail activities to establish on the Doolytle land will have a positive economic effect and encourage competition, while ensuring that likely future demand will be met with appropriately zoned land.

CONCLUSION

143. Overall, I consider the refined relief I support for Doolytle is more appropriate than the recommendation contained within the Council report for the reasons outlined in my evidence.



Alex Dunn
20 October 2023

ANNEXURE A – AMENDMENTS TO PROVISIONS SOUGHT

Annexure A

Amendments to Provisions Sought

49.2.3 Objective – The Commercial Precinct is compact, convenient and accessible for meeting the needs of local residents

Policies

...

49.2.3.2 ~~Limit~~ Manage the establishment of service stations and manage ~~avoid~~ the establishment of business activities that would undermine the function and role of other centres, including Industrial, Service, Large Format Retail activities and large office spaces.

49.4 Rules - Activities

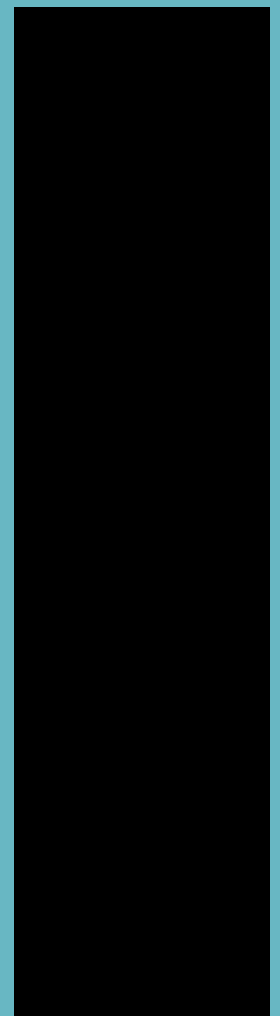
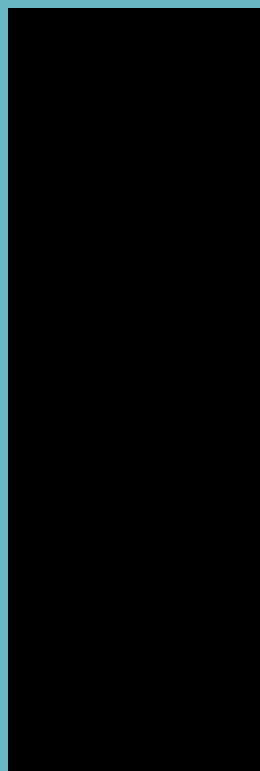
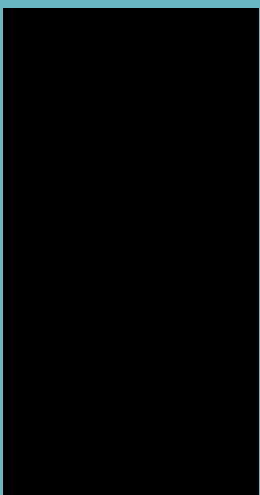
Rule	Activities located in the Te Pūtahi Ladies Mile Zone	Activity Status
49.4.14	One Large Format Retail tenancy retailing grocery products within the Commercial Precinct <u>excluding on land legally described as Lot 2 DP 536231 and Lot 403 DP 322452 which shall not be subject to this rule.</u>	P

49.5 Rules – Standards

Rule	Standard for activities located in the Commercial Precinct and Glenpanel Precinct	Non-Compliance Status
49.5.38	<p>Retail Activity</p> <p>49.5.38.1 The maximum retail floor area of a single retail tenancy shall be 300m², except as provided for by 40.5.38.2 below.</p> <p>49.5.38.21 The maximum retail floor area of the single Large Format Retail tenancy retailing grocery products provided for in Rule 49.4.14 shall be 2000m² <u>excluding on land legally described as Lot 2 DP 536231 and Lot 43 DP 322452 which shall not be subject to this maximum coverage.</u></p>	NC
49.5.41	<p>Building Height</p> <p>...</p> <p>49.5.41.5 Buildings on land legally described as Lot 2 DP 536231 and Lot 403 DP 322452 shall have a maximum height of 12 metres.</p>	<u>D</u>

ANNEXURE B – LUMEN GREENHOUSE GAS EMISSIONS ASSESSMENT

Doolyttle & Sons
Greenhouse Gas Emissions
Assessment for 466 Ladies Mile
Frankton Report
EAC19982



Document Control

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0.1	06/10/2023	Draft Report for Internal review	Paul Farrelly	Tobias de Ridder	
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The proposed development’s impact on emissions.....9

Conclusion 11

Glossary

Greenhouse Gas (GHG)	Greenhouse gases (GHG) are gases that influence the way in which the Earth's atmosphere traps heat. Increasing levels of GHGs in the atmosphere are causing the phenomenon of climate change .
Carbon Dioxide Equivalent (CO₂e)	A standard unit for measuring GHG Inventories. The impact of each different GHG is expressed in terms of the global warming potential (GWP) of one unit of carbon dioxide (CO ₂). Typically expressed in kilograms (kg CO ₂ -e) or tonnes (tCO ₂ -e).
Global Warming Potential	<p>A measure of a gas's ability to cause radiative forcing in the atmosphere (or climate change) relative to the ability of CO₂.</p> <p>For example, sulphur hexafluoride (SF₆) has a GWP of 23,900, thus 1kg of SF₆ emitted is 23,900 times more potent than 1kg of CO₂.</p>
Emission Factor	A metric that converts a specific emission source - such as a litre of diesel - into terms of CO ₂ or CO ₂ -e.

Introduction

- 1 This report provides an assessment of greenhouse gas (*GHG*) emissions for the property located at 466 Frankton Ladies Mile, in the Queenstown area.
- 2 The owner of the property seeks for the property to be included within the commercial precinct that is proposed as part of the Te Pūtahi Ladies Mile Plan Variation, as notified by the Queenstown Lakes District Council (QLDC).

Executive Summary

- 3 The National Policy Statement on Urban Development 2020 (*NPS*) requires decision makers to consider whether proposals for land-use change in urban areas “support reductions in greenhouse gas emissions”.
- 4 The proposed rezoning change to commercial would support GHG emissions reductions primarily through a reduction in reduced transport-related emissions within the Queenstown area.
- 5 The rezoning proposal supports the New Zealand government’s target of reducing emissions via reducing kilometres travelled by the light fleet by 20 per cent by 2035.
- 6 This site’s proximity to the residential areas of Shotover Country/Lake Hayes Estate is expected to result in a reduction of the amount of travel required by residents to access goods and services. This is because the introduction of new commercial premises will reduce the need for residents to travel to other commercial centres in the Queenstown area, which - due to their distance - are typically accessed via private vehicle.
- 7 Development of the site will also result in an increase in employment opportunities within the Shotover Country/Lake Hayes estate area. This is likely to reduce the average commuting distance (and associated transport emissions) for workers who reside in the area, as the site is far closer to residents than alternative locations of employment within the Queenstown area.
- 8 The site is expected to have good accessibility via active modes of travel (walking and cycling) for residents of the Shotover Country/Lake Hayes Estate, as there are no major roads to contend with when accessing the site.
- 9 Therefore, a rezoning of the site to a commercial designation is expected to lead to a reduction in emissions within the Queenstown district, compared to if the site was not designated for commercial.

Introduction to greenhouse gases

- 10 There are several gases that contribute to the problem of global warming, the most prevalent of these being carbon dioxide (CO_2), methane and nitrous oxide.
- 11 Each of these gases has differing abilities to trap extra heat in the atmosphere, and it is the trapping of this heat that leads to global warming.
- 12 When evaluating GHG emissions, it is useful to have a common measure to allow comparisons between gases.
- 13 As CO_2 is by far the most prevalent of the GHGs, it is standard practice when measuring emissions to determine the level of each gas emitted, and then convert these emissions into their carbon dioxide equivalent, or $\text{CO}_2\text{-e}$.

- 14 The global warming potential (*GWP*) of a gas is a measure of its ability to trap extra heat in the atmosphere over time relative to CO₂. This is most often calculated over a 100-year period and is known as the 100-year GWP.
- 15 The GWP of CO₂ is 1.
- 16 New Zealand is committed to reducing GHG emissions substantially in the coming years. The Climate Change Response (Zero Carbon) Amendment Act 2019 sets in legislation the following targets for the country:
- 16.1 reduce net emissions of all greenhouse gases (except biogenic methane) to zero by 2050; and
- 16.2 reduce emissions of biogenic methane to 24-47 per cent below 2017 levels by 2050, including to 10 per cent below 2017 levels by 2030.
- 17 In response to the Zero Carbon Act, the Government has developed a comprehensive Emissions Reduction Plan (*ERP*)¹, which was released on 16th May 2022. This sets out how New Zealand will achieve the emissions reduction targets and identifies a comprehensive set of actions and additional targets that will support achievement of the overall goals.
- 18 The ERP has been heavily guided by advice provided by the climate change commission, in their *Ināia tonu nei: a low emissions future for Aotearoa*² report (June 2021).
- 19 Key strategies for achieving the reduction targets include:
- 19.1 increasing the mix of renewables in our electricity generation network;
- 19.2 conversion of fossil fuelled industrial, manufacturing, and process heat to low emissions energy (electricity or biomass);
- 19.3 electrification of our vehicle fleet;
- 19.4 increasing the proportion of (personal) travel undertaken using active travel modes and public transport;
- 19.5 reducing freight emissions; and
- 19.6 reducing agricultural emissions through a mix of lower herd numbers and technological innovations.

National Policy Statement on Urban Development

- 20 The National Policy Statement on Urban Development 2020³ (*NPS-UD*) requires decision makers to consider whether proposals for land-use change in urban areas “support reductions in greenhouse gas emissions”.
- 21 I consider this to be the most relevant policy, in respect of GHG emissions in New Zealand, when considering rezoning applications in urban areas.

¹<https://environment.govt.nz/what-government-is-doing/areas-of-work/climate-change/emissions-reduction-plan/>

²<https://www.climatecommission.govt.nz/our-work/advice-to-government-topic/inaia-tonu-nei-a-low-emissions-future-for-aotearoa>

³<https://environment.govt.nz/publications/national-policy-statement-on-urban-development-2020-updated-may-2022/>

- 22 New Zealand has a growing population and a need to develop facilities and employment opportunities for this population. This is especially true in Queenstown, one of the fastest growing areas in the country.
- 23 It is therefore important that decisions on where to locate new commercial developments in New Zealand consider their overall net impact on New Zealand’s total GHG emissions, as opposed to whether the land-use change results in emissions reductions relative to the existing land-use.
- 24 Were the requirement to be that the land-use change itself reduced emissions directly associated with that land use, it would be challenging for commercial or residential development to take place, especially in a Greenfields area.
- 25 This is because emissions will be incurred during the development phase (building the infrastructure and housing/commercial buildings), and then during the operational phase (primarily energy use and travel).
- 26 An exception to this might be where current land-use is carbon-intensive (industrial production, or intensive dairy farming). In this case, a change to residential or commercial use could result in an actual reduction in emissions.
- 27 Regardless, it is extremely difficult to accurately calculate future GHG emissions arising from a proposed land-use change with precision, given changes (technology, population, behavioural) that could occur in future.
- 28 Moreover, I do not believe such a calculation is required under the NPS-UD, as the key test is whether the proposed development “supports a reduction in greenhouse gas emissions”.
- 29 Given this, this paper does not attempt to make specific calculations about the future emissions of the land-use, and instead we focus on taking a “big picture” look at how the development impacts on GHGs at a higher level.

Overview of proposed development

- 30 The site is located at 466 Frankton-Shotover Country Highway, in the rapidly growing Shotover Country/Lake Hayes area.

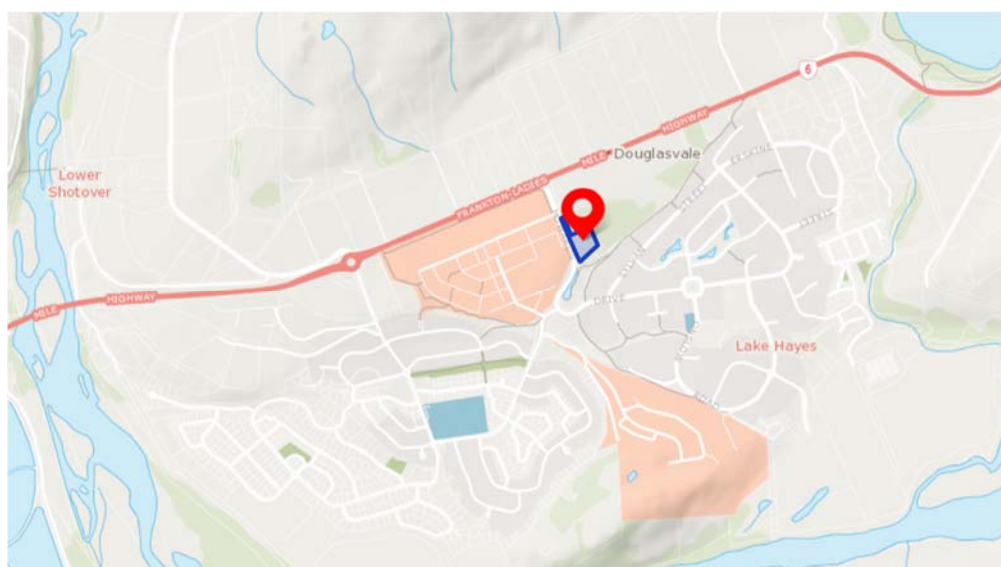


Figure 1: Location of the development site within the Shotover Country/Lake Hayes area

- 31 This site is approximately 4km to the east of Frankton, and 11.5km northeast of central Queenstown. Frankton and Queenstown provide most of the commercial activity and employment within the greater Queenstown area. Access to these areas from Shotover Country/Lake Hayes is somewhat constrained due to the only direct route being State Highway 6, which crosses the Shotover River by way of a single lane bridge. This route has become increasingly congested as the population of Queenstown continues to grow.



Figure 2: Location of the development site within the greater Queenstown area

- 32 The site itself is located adjacent to Howards Drive, the main access road from State Highway 6 into Shotover Country. The main existing commercial hub for the Shotover Country/Lake Hayes area is Kawarau Park, which is located approximately 200-300m (as the crow flies) from the site.
- 33 The site currently comprises a single residential dwelling and a few sheds. Several mature trees are located around the site boundary of the site.

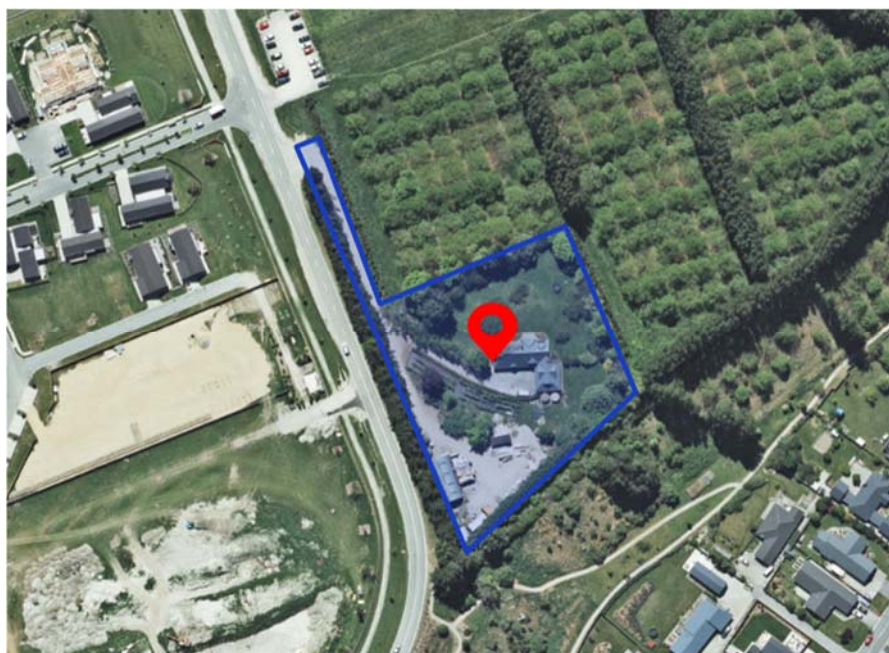


Figure 3: Aerial view of the development site adjacent to Howards Drive

- 34 The site is currently zoned as rural.
- 35 The QLDC has proposed a variation (Te Pūtahi Shotover Country Plan Variation⁴) to the Proposed District Plan (PDP), which also includes land immediately to the North and East of the proposed site. Under the plan change, the site is designated to change to “lower density suburban residential zone”.
- 36 According to discussions with the applicant, there has been a proposal to allow for 12 new residential lots in addition to the existing site, which has been agreed in principle with QLDC, but has not progressed.
- 37 The applicant wishes for the site to be rezoned as commercial.
- 38 The applicant advises that there are no concept plans yet but the likely development concept would be for a 'multi-use Strip Shop' type development.
- 39 I believe this would complement the existing commercial area located in Kawarau Park⁵, which contains a range of tenancies including a Night n’ Day convenience store, a café/restaurant, and several healthcare-related tenancies.
- 40 Although there are at this stage no specific tenants committed for the site, the proposed rezoning is expected to attract commercial and/or retail activities to the site.
- 41 I would anticipate that tenancies will likely be self-selected, accounting for their likely desirability and convenience to nearby residents. An advantage of the location is that it would mean that local residents would not need to travel further afield (to Frankton or Queenstown) to access goods/services.
- 42 Therefore, the site is likely to appeal to businesses who offer “day-to-day” type services, such as a café, food retail, or health and beauty services or as opposed to “destination” type retail such as large-format retail. The location may also be desirable as office space for professional services firms, as employees would not need to travel into Frankton or Queenstown for work.
- 43 The applicant has advised that a possible range for employment numbers on the area of land covered by the proposed zone could potentially reach 25-40 at full development.
- 44 If the applicant is unsuccessful with his request for a rezoning to commercial, I expect that the site will most likely be developed with additional residential lots.

The proposed development’s impact on emissions

- 45 There is currently a shortage of commercial activities (shops) and employment opportunities in Shotover Country/Lake Hayes Estate, which means that residents of these areas need to travel into Frankton or Queenstown for employment and to purchase goods and services.
- 46 Most of these trips are undertaken in fossil-fuel powered vehicles, thus generating emissions in the form of carbon dioxide.

⁴<https://www.qldc.govt.nz/your-council/district-plan/te-putahi-ladies-mile-variation>

⁵<https://www.kawaraupark.co.nz/>

- 47 For instance, the nearest supermarket is located at Frankton (approximately 4km). This distance is a relatively large distance compared to built-up urban areas.
- 48 It is reasonable to assume that currently most “high frequency” trips originating in the area are made to the most conveniently located destination for the purpose of the trip (e.g., nearest dairy/takeaway outlet/café) whereas trips to “destination” locations – such as heading to a larger supermarket for weekly shop would occur less frequently.
- 49 It is therefore logical to expect that the creation of more commercial activity and employment in Shotover Country/Lake Hayes Estate, such as by the development the proposed site at 466 Ladies Mile Frankton, will result in less travel to Frankton/Queenstown for the purchasing of goods and services and employment.
- 50 I would anticipate that tenancies in the proposed commercial area will likely be self-selected, accounting for their likely desirability and convenience to nearby residents, and that these tenancies will be well utilised by residents.
- 51 I expect that one of the reasons tenancies will choose to operate in this location is because they can be closer to their customer base.
- 52 The site appears to have good accessibility via active modes of travel for residents of the Shotover Country/Lake Hayes estate areas, as there are no major arterial roads to navigate to access the site.
- 53 This, combined with the site’s proximity to residential areas of Shotover Country/Lake Hayes estate is expected to result in a reasonable proportion of trips to be via active (zero-emissions) travel modes.
- 54 If we (conservatively) assumed that the introduction of additional commercial tenancies in the development site resulted in 50 less passenger vehicle trips out of the Shotover Country/Lake Hayes Estate area each day (25 to Queenstown @ 11.5kms and 25 Frankton @ 4kms), then the reduction in kms travelled would be:

$$25 \times 4 + 25 \times 11.5 = 387.5 \text{ km one way}$$

$$387.5 \times 2 \text{ way} \times 365 \text{ days} = 282,875 \text{ kms avoided}$$

- 55 To put this into perspective through a GHG emissions lens, the average vehicle in the New Zealand light passenger fleet emits 0.252kg CO₂-e⁶ for every kilometre travelled.
- 56 So, if we assumed that vehicles in Queenstown are broadly like the average NZ fleet, then the avoided emissions would be:

$$282,875 \text{ kms avoided} \times 0.252 \text{ kg CO}_2\text{-e/km} = 71,284 \text{ kg CO}_2\text{-e}$$

- 57 It is noted that some commercial development is proposed as part of the Shotover Country Masterplan, however this is located on the Northern side of State Highway 6.
- 58 State Highway 6, with its substantial daily traffic volume, acts as a major barrier to travel to the Northern side using active transport modes (cycling and walking). Therefore, it is unlikely that many trips from Shotover Country/Lake Hayes Estate will be undertaken using zero emissions transport modes. In other words, people who are travelling from Shotover Country/Lake Hayes Estate to the

⁶<https://environment.govt.nz/publications/measuring-emissions-a-guide-for-organisations-2023-emission-factors-summary/>

proposed Shotover Country commercial area on the Northern side of State Highway 6 are likely to do so via passenger vehicle.

59 Locating commercial activity South of the State Highway 6 (as opposed to the Northern side of SH6) is likely to result in a greater proportion of travel via active modes, and therefore lower emissions.

60 It is difficult to accurately model or predict the level of travel-related emissions that will arise from employee travel to a proposed development, as we cannot know where the staff may reside.

61 With fuel prices currently at record levels, and seemingly set to remain high in future, there is an economic incentive for employees to minimise their travel costs as much as possible. There are several ways this can be achieved in practice: (1) An employee can seek employment closer to where they live, (2) the employee can move to a location closer to their place of employment, (3) the employee can opt to travel via lower cost modes (e.g., walking or cycling). And in some cases, depending on the nature of work, the employee can also opt to work from home more frequently.

62 Given the above, it is reasonable to assume that a significant proportion of the people that will be employed in businesses within the proposed development site will live nearby. I expect that most of these people are likely to live within the existing Shotover Country/Lake Hayes estate area.

63 By providing more employment on the of south side of State Highway 6, it is likely that more residents will opt to work in or around their homes, where possible.

64 As such, I would expect that the creation of more jobs within the Shotover Country/Lake Hayes estate area would reduce the total commuting emissions within Greater Queenstown.

Conclusion

65 The proposed rezoning supports GHG emissions reductions primarily as it will reduce transport-related emissions associated with employee commuting and customer travel.

66 Therefore, the rezoning proposal supports the New Zealand government's target of reducing emissions via reducing kilometres travelled by the light fleet by 20 per cent by 2035.

67 Development of the site into commercial tenancies will result in an increase in employment opportunities within the Shotover Country/Lake Hayes estate areas.

68 This is likely to reduce the average commuting distance for employed residents of Shotover Country/Lake Hayes estate, as the site is far closer to residential areas than alternative locations of employment within Queenstown, which are likely to be accessed by private vehicle.

69 The site is expected to have good accessibility via active modes of travel for residents of the Shotover Country/Lake Hayes estate areas, as there are no major arterial roads to navigate.

70 This, combined with the site's proximity to residential areas of Shotover Country/Lake Hayes estate is expected to result in a significant proportion of commuting to be via active (zero-emissions) travel modes.

ANNEXURE C – AURUM SURVEY INDICIATIVE ACCESS PLANS

First Ave



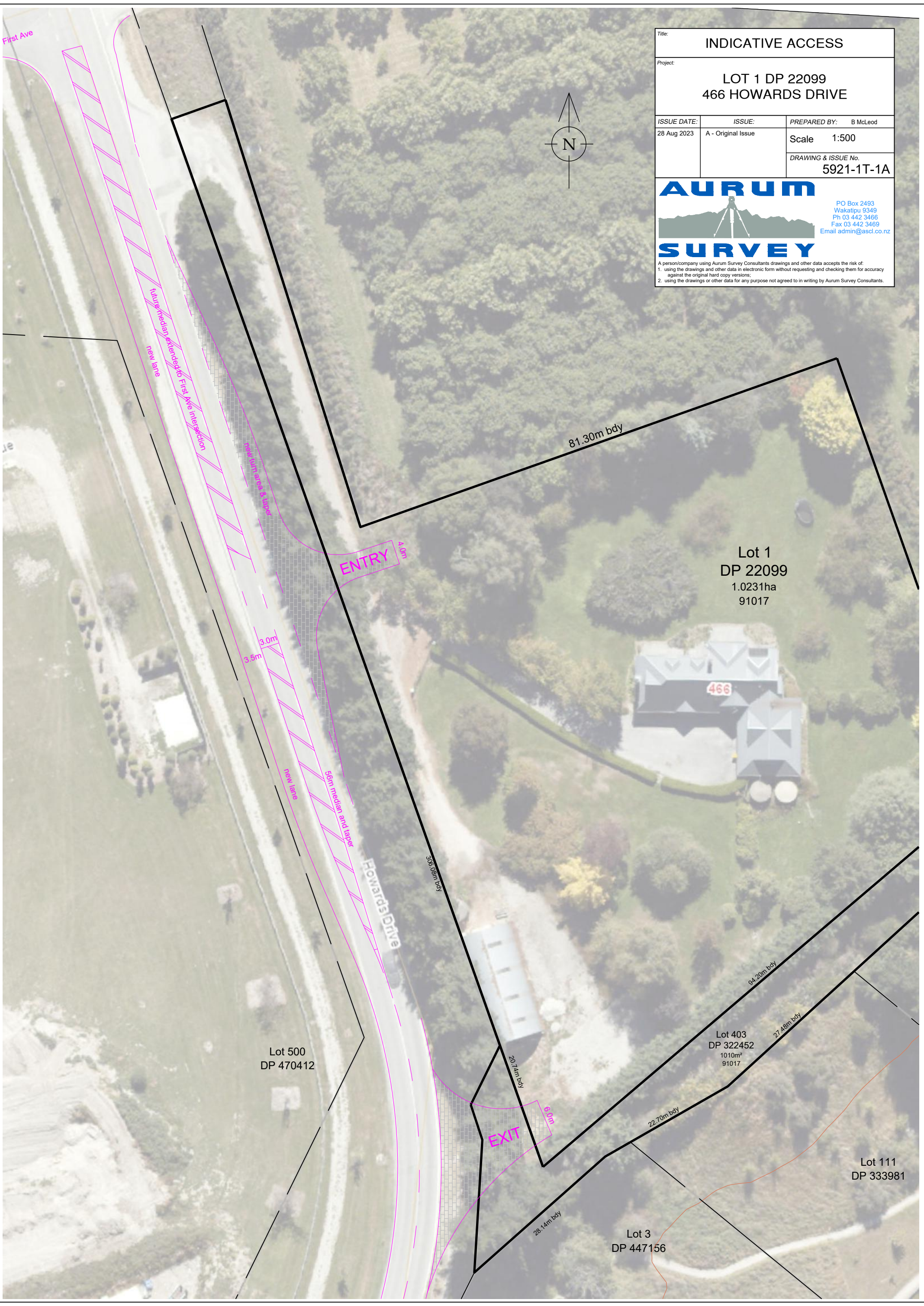
Title: INDICATIVE ACCESS		
Project: LOT 1 DP 22099 466 HOWARDS DRIVE		
ISSUE DATE: 28 Aug 2023	ISSUE: A - Original Issue	PREPARED BY: B McLeod
		Scale 1:500
		DRAWING & ISSUE No. 5921-1T-1A

AURUM

SURVEY

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Lot 1
 DP 22099
 1.0231ha
 91017

466

ENTRY 4.0m

EXIT 6.0m

Lot 500
 DP 470412

Lot 403
 DP 322452
 1010m²
 91017

Lot 111
 DP 333981

Lot 3
 DP 447156

81.30m bdy

36.00m bdy

20.74m bdy

22.70m bdy

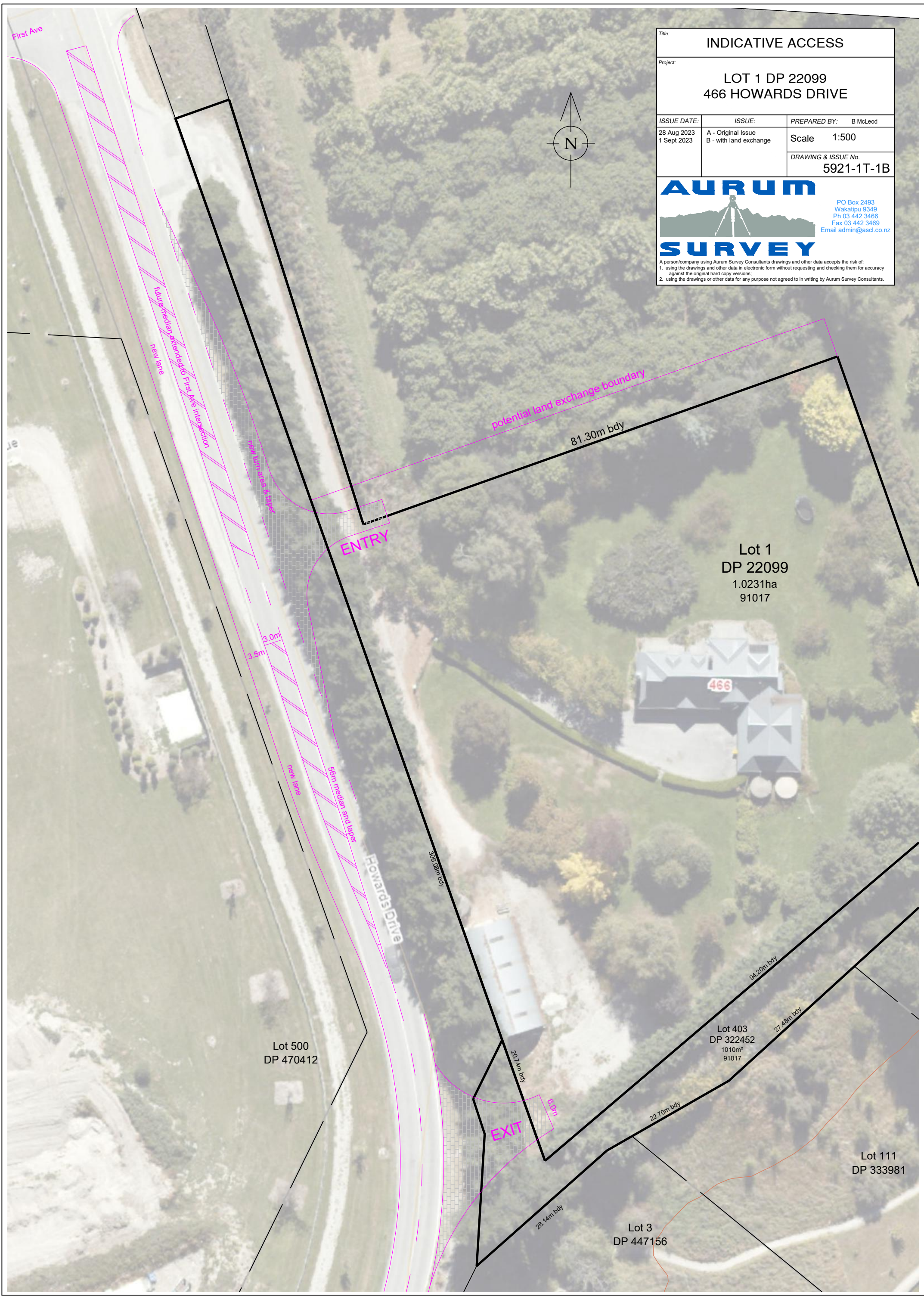
28.14m bdy

94.20m bdy

27.48m bdy

3.5m

3.0m



Title: **INDICATIVE ACCESS**

Project: **LOT 1 DP 22099
466 HOWARDS DRIVE**

ISSUE DATE: 28 Aug 2023 1 Sept 2023	ISSUE: A - Original Issue B - with land exchange	PREPARED BY: B McLeod
		Scale 1:500
		DRAWING & ISSUE No. 5921-1T-1B



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81.30m bdy

Lot 1
DP 22099
1.0231ha
91017

EXIT

Lot 403
DP 322452
1010m²
91017

Lot 500
DP 470412

Howards Drive

ENTRY

Lot 111
DP 333981

Lot 3
DP 447156

new lane
3.5m
3.5m
3.5m

6.5m median and verge

Title: **INDICATIVE ACCESS SOUTH**

Project: **LOT 1 DP 22099
466 HOWARDS DRIVE**

ISSUE DATE:	ISSUE:	PREPARED BY:	B McLeod
29 Aug 2023	A - Original Issue	Scale	1:500
		DRAWING & ISSUE No.	5921-1T-2A



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Potential boundary from land exchange
81.30m bdy

Lot 1
DP 22099
1.0231ha
91017

Lot 403
DP 322452
1010m²
91017

Lot 111
DP 333981

Lot 3
DP 447156

Lot 500
DP 470412

Howards Drive

EXIT

ENTRY

new lane

6.5m median and verge

3.5m

3.5m

3.5m

306.08m bdy

20.74m bdy

22.70m bdy

28.14m bdy

94.20m bdy

27.48m bdy

88.84m bdy

73.00m bdy

Title: **INDICATIVE ACCESS SOUTH**

Project: **LOT 1 DP 22099
466 HOWARDS DRIVE**

ISSUE DATE:	ISSUE:	PREPARED BY:	B McLeod
29 Aug 2023 31 Aug 2023	A - Original Issue B - With land exchange	Scale	1:500
		DRAWING & ISSUE No.	5921-1T-2B

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