

**Before the Independent Hearing Panel
appointed by Queenstown Lakes District Council**

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

**Summary Statement of
Alex John Dunn
for Roman Catholic Diocese of Dunedin**

Dated: 11 December 2023

Lane Neave
2 Memorial Street
PO Box 2331
Queenstown
Solicitor Acting: Joshua Leckie
Email: joshua.leckie@laneneave.co.nz
Phone: 03 372 6307

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INTRODUCTION

Qualifications and Experience

1. My name is Alex John Dunn. I am a Planner at Southern Planning Group Limited. I have prepared a statement of evidence on behalf of the Roman Catholic Diocese of Dunedin (**Diocese**) dated 20 October 2023 in relation to its submission on the Te Pūtahi Ladies Mile (**TPLM**) variation (**Variation**). I have the qualifications and experience set out at paragraphs [1] - [6] of my evidence. I reconfirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023.

Relief Sought

2. As the Queenstown population continues to grow, many families are located further from the Queenstown town centre which is the location of the only Catholic Primary School in the area – being St Josephs. In addition to this, the capacity of St Josephs is constrained by its location which means that is not of an appropriate size for the current (and future) demand.
3. The notified provisions of the TPLM Variation required all development to be in accordance with the Structure Plan.¹
4. As notified, the Zoning Plan was incorporated into the Structure Plan which I believe would have resulted in developments needing to be in accordance with the Medium Density Precinct which is a residential area.² This would require all developments to be residential in nature to avoid conflicting with the Zoning Plan. This is consistent with how QLDC interprets non-residential activities in other areas that are subject to a Structure Plan that incorporates zoning (including activity areas), such as Jacks Point.
5. In addition, the notified provisions required that *all* developments within residential precincts achieve a prescribed dwelling density. Non-compliance with both the Structure Plan rule and density rule would result in non-complying consents being required.³
6. In my view, when the notified Variation is read as a whole, including the zone purpose, corresponding objectives and policies and rules, the establishment of education and community activities within the Medium Density Precinct would be difficult. Notified Policy 49.2.2.1.b for example sought to avoid development that

¹ Notified Rule 49.5.15

² Notified Rule 49.5.16

³ Above, n 1 and n 2.

would not achieve residential densities required in each Precinct. This is interpreted as any development that would not achieve the residential density required should be avoided.

7. I confirm that the Diocese seeks the following relief:
 - (a) that the amended provisions of the TPLM Zone, as provided for in Jeffery Brown's rebuttal evidence dated 10 November 2023 and the Hearing Version dated 8 December 2023, are accepted by the Panel.
8. During planning caucusing, it was evident that the provisions of the Plan did not seek to unnecessarily restrict education and community activities becoming established in the residential precincts.
9. Mr Brown has since made it clear, through the amended provisions, that there is a restricted discretionary consenting pathway for education activities and a discretionary consenting pathway for community activities within residential precincts of the zone.
10. Mr Brown has recommended the removal of the Zoning Plan from the Structure Plan. Rule 49.5.16 as it relates to density specifically refers to residential density for residential developments. It is clear that non-residential activities will not be subject to the rule.
11. In addition, a statement has been added to the zone purpose section to the effect that the Zone precinct statements do not limit proposals for community, education or recreation activities in the precinct.⁴
12. Policy 49.2.2.1 b), as amended in Mr Brown's rebuttal, seeks to avoid residential development that does not achieve the residential densities, as opposed to development in general as per the notified provisions. It is clear that this policy applies only to residential developments and would not be relevant for resource consent proposals to establish education and community activities.
13. I consider that the relief sought, as supported by Mr Brown, sets out a clear expectation regarding the different land uses that can be anticipated within residential precincts.
14. Overall, I consider that the relief sought is more appropriate than the notified provisions.

⁴ 49.1 Te Pūtahi Ladies Mile Provisions – Hearings Version, dated 8 December 2023.



Alex John Dunn

11 December 2023