

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER OF

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

**STATEMENT OF EVIDENCE OF IAN GREAVES
ON BEHALF OF BIKE WANAKA (SUBMITTER NO. 73)**

11th September 2023

Qualifications and Experience

1. My name is Ian Christopher Greaves. I hold the qualification of Bachelor of Applied Science (Environmental Management (Hons)) from the University of Otago. I am a full member of the New Zealand Planning Institute.
2. I have practiced in planning and land development since 2006. I am currently employed by Southern Ventures NZ Ltd as their Planning and Development Manager. I also sit on the committee of Bike Wanaka whom I am writing this evidence for.
3. Throughout my professional career, I have been involved in a range of resource management and planning policy matters in roles with Southern Ventures, Southern Planning Group, Queenstown Lakes District Council, the Environment Agency (UK) and Opus International Consultants (NZ). This experience includes over 12 years based in the planning field in Wanaka. I have made numerous appearances in front of hearing panels, and I have also given evidence in the Environment Court.
4. As a committee member of Bike Wanaka, I am unable to comply with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note. However, I have prepared this evidence with reference to it. I confirm that I have read the Code of Conduct for expert witnesses contained in the Environment Court Practice Note. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions I express. In particular, unless I state otherwise, this evidence is within the scope of my expertise, and I have not omitted to consider material facts known to me that might alter or detract from the opinions I express.

Scope of Evidence

5. The submission by Bike Wanaka Inc sought to ensure that the landscape capacity assessment for all Upper Clutha Priority Areas provided some capacity for additional walking and cycling trails. This is on the basis of the significant positive effects created by these trail networks for the community as a whole.

6. This evidence focuses on this confined issue and following the recommended changes coming from the Section 42A report (and attached expert evidence) the main thrust of this evidence focuses on the capacity assessments for Mount Iron and the Mount Alpha Priority Areas.

7. In preparing my evidence I have had regard to the following documents:
 - The Section 32 Report and Appendices.

 - The Section 42A report prepared by Ruth Evans.

 - Landscape evidence prepared for QLDC by Bridget Gilbert and Jeremy Head.

 - Otago Regional Policy Statements 2019 and 2021.

 - Operative Queenstown Lakes District Plan (ODP).

 - Proposed Queenstown Lakes District Plan (PDP).

8. I have resided in Wanaka for over 12 years and I am very familiar with the areas of the Upper Clutha that this evidence relates too.

Bike Wanaka Background

9. Bike Wanaka Inc has been in existence since the early 1990's developing and growing mountain biking in the Upper Clutha region. The club has a membership base of over 850 members. The Club's priorities are to:
 - Build new mountain bikes tracks in the Upper Clutha.
 - Maintain the existing mountain bike track network in the Upper Clutha.
 - Hold mountain biking events throughout each year.
 - Access great discounts and deals for our members.
 - Advocate for broader biking issues in the Upper Clutha.
 - Develop riders and coaches in the region.
 - Build strong relationships with other organisations – QLDC, DOC, Lake Wanaka Tourism and Upper Clutha Tracks Trust.

10. Bike Wanaka Inc manages and maintains a number of existing mountain bike tracks or has plans to extend its mountain bike track network in a number of areas covered by the Upper Clutha Priority Area landscape schedules.

Landscape Capacity for Walking and Biking Trails

11. The evidence of Ms Bridget Gilbert and Mr Jeremy Head has addressed the Bike Wanaka submission and for the Upper Clutha Priority Areas excluding Mount Iron and Mount Alpha suitable wording within the Capacity Assessments has now been proposed that would allow appropriate consideration for future walking and cycling trails. These changes are accepted and supported by Bike Wanaka.

Mount Iron PA – Landscape Capacity for Walking and Cycling Trails

12. Up until recently, Mount Iron was owned by Allenby Farms Ltd which is a company wholly owned by the Cleugh Family. In May 2023 QLDC purchased 100 hectares of Mount Iron which has now vested as Recreation Reserve.
13. The plan attached to this evidence shows the existing track network on Mount Iron, including the walking trails, the 4wd tracks and older mountain bike tracks. Mountain biking tracks have existed on Mount Iron since the mid-1990's and in particular a series of linked Grade 4+ track from near the top to the gully at Hidden Hills has existed and been maintained by riders. More recently access and use of these trails has been prohibited by the landowner. No new mountain bike tracks have been developed on the Mount Iron since the late 1990's.
14. Now that Mount Iron is in public ownership there is a strong desire by the mountain biking community to reinvigorate mountain biking on the mountain. Initially and subject to QLDC approval this will be in the form of utilising the network of existing mountain bike trails but in the future it may entail future tracks, particularly a more suitable up track. Much of the existing trail network will require maintenance before it can be used for biking.
15. Mr Head for QLDC has recommended that the capacity assessment for earthworks on Mount Iron is changed to state (added text underlined): *(v) earthworks – very limited to no landscape capacity for earthworks and additional trails that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns.*

16. This change is recommended as Mr Head has commented that Mount Iron “is well endowed with trails” and any additional trails may trigger cumulative effects through further vegetation cover change as well as associated earthworks.

17. It is accepted that further biking trails if not built sensitively could affect the identified landscape values of Mount Iron and protecting those landscape values is a requirement. However, it is submitted the maintenance and enhancement of public access and recreational values needs to be considered alongside this. This position is supported by the following key pieces of legislation and planning policy:

- Section 7 of the RMA requires regard to be had to the maintenance and enhancement of amenity values. Amenity values includes recreational attributes.

- The Otago Regional Policy Statement (2019).
 - Objective 5.1 States: *Public access to areas of value to the community is maintained or enhanced.*

 - Policy 5.3.5 States: *Recognise the social and economic value of some forms of outdoor recreation and tourism having access to, and being located within, outstanding natural features and landscapes.*

- Queenstown Lakes Proposed District Plan
 - Objective - 3.2.4.5: *Public access to the natural environment is maintained or enhanced.*

 - Objective - 3.2.6.2: *A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.*

 - Objective - 3.2.6.3: *The contribution that community, social, recreational and cultural facilities and activities make to identity and sense of place for residents of the District is recognised and provided for through appropriate location and sound design.*

18. It is well established that the protection of landscape values is a fundamental requirement set by the hierarchy of planning legislation and planning documents, this is well covered in the evidence by QLDC. However, as I have outlined above public access to the natural environment plus recognising and enhancing the benefits that recreation and recreation facilities bring to communities is another important theme that Council needs to recognise and provide for. I therefore consider it is imperative that the proposed landscape schedules do not overly restrict the ability to provide public access and public recreation which is so widely treasured and valued by a vast proportion of our communities. Therefore, taking into consideration Mr Head's concerns that may arise from additional public walking and cycling trails on Mount Iron in conjunction with the policy outcomes that encourage public access and recognise the benefits and importance of recreational values it is suggested that the capacity assessment for public walking and cycling trails on Mount Iron should be amended to provide some scope for new walking and cycling trails whilst not losing the key element of landscape protection. The following capacity assessment wording is recommended for the Mount Iron Priority Area (deleted text strikethrough and added text underlined):

(v) earthworks – very limited to no landscape capacity for earthworks ~~and additional trails that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns.~~ Limited capacity for new public walking and cycling trails that are located to integrated with existing networks, designed to be of a sympathetic appearance and character, and integrate with landscape restoration and enhancement.

Mount Alpha – Landscape Capacity for Walking and Cycling Trails

19. The landscape capacity for walking and cycling trails in the Mount Alpha Priority area is proposed to state (my emphasis):

(v) earthworks – limited landscape capacity for earthworks that protect naturalness and expressiveness attributes and values and are sympathetically designed to integrate with existing natural landform patterns. Limited capacity for trails that are of a low-key rural character and are sympathetic to the landform patterns.

20. It is recommended that the wording for walking and cycling trails in the Mount Alpha Priority Area should have the same capacity rating as the West Wanaka Priority Area where the wording is proposed to state (my emphasis):

(viii) Transport Infrastructure – very limited landscape capacity for modestly scaled low-key ‘rural’ roading that is positioned to optimise the integrating benefits of landform and vegetation patterns. Some landscape capacity for trails that are located to integrate with existing networks, designed to be of a sympathetic appearance and character; and integrate landscape restoration and enhancement.

21. The reason for this recommendation follows the same policy argument as outlined for Mount Iron, with the added weight of objective 21.2.12 and associated policies that encourage public access and access to a wide range of recreational experiences on the lakes and rivers, and their margins. The Mount Alpha Priority Area covers part of the Lake Wanaka margin and therefore this additional policy outcome is applicable. It also seems conflicting that Mount Alpha has a higher threshold for trails than the West Wanaka Priority Area which adjoin and share similar landscape values.

Conclusion

22. Overall, Bike Wanaka now supports the capacity rating for public walking and cycling trails recommended by QLDC for each of the Upper Clutha Priority Areas with the exception of Mount Iron and Mount Alpha. Recommendations are made in this evidence to amend the capacity ratings for the Mount Iron and Mount Alpha Priority Areas to ensure public walking and cycling trails are provided for whilst not losing the key element of landscape protection. This recommendation is supported by policy outcomes in the Regional Policy Statement and Proposed District Plan that encourage the maintenance and enhancement of public access and recognise the benefits and importance of recreational values.

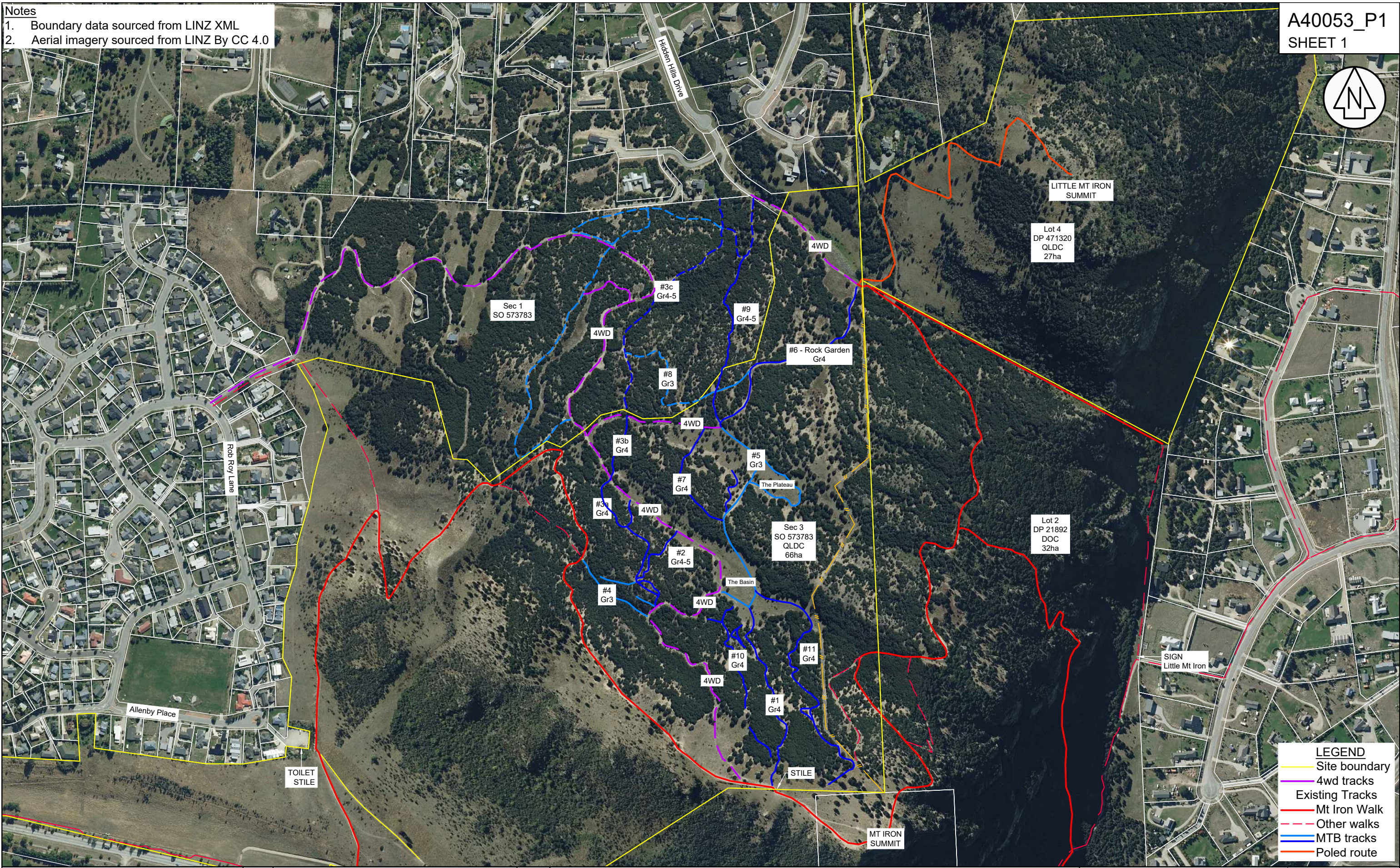


Ian Greaves

11th September 2023

Attachment 1 – Mount Iron Track Plan

- Notes
1. Boundary data sourced from LINZ XML
 2. Aerial imagery sourced from LINZ By CC 4.0



LEGEND

- Site boundary
- 4wd tracks
- Existing Tracks
- Mt Iron Walk
- Other walks
- MTB tracks
- Poled route



REVISION	DESCRIPTION	DATE
A	ORIGINAL ISSUE	19/8/23

**MT IRON, WANAKA
EXISTING TRACKS**

PREPARED FOR				SCALE	1: 5,000 @ A3
SURVEYED		DATE	CHECKED	DATE	DATUM & LEVEL
TD	8/8/23	TD	8/8/23	8/8/23	NZTM2000
DRAWN		DATE	APPROVED	DATE	DRAWING REFERENCE
TD	8/8/23	TD	8/8/23	8/8/23	A40053_P1
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