

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Streams 17
and 18 –
Stage 3 and 3b
Proposed District Plan

**REPLY OF NATALIE DIANNE HAMPSON
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

ECONOMICS: GENERAL INDUSTRIAL ZONE

4 September 2020

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1. INTRODUCTION

- 1.1 My name is Natalie Dianne Hampson. I prepared a statement of evidence in chief¹ (**EiC**) and two statements of rebuttal² for the General Industrial Zone (**GIZ**), Three Parks and the Settlements Zone (Hawea, Universal), filed in Hearing Streams 17 and 18. My qualifications and experience are set out in my EiC.
- 1.2 I attended the hearing on the 29th June to the 2nd July 2020 and have been provided with reports (and recordings) of what has taken place at the hearing since where relevant to my evidence.
- 1.3 This reply evidence covers the following issues:
- (a) Mr Farrell’s written response on behalf of Wayfare Limited and Cardrona Alpine Resort Limited dated 24 August 2020.
 - (b) The Supplementary Statement of Mr Devlin and Mr Ballingall for Tussock Rise Limited (**TRL**) dated 13 August 2020.
 - (c) Matters raised during questions of the Panel put to Mr Ballingall for TRL.
 - (d) Minute 35 of the Panel – issues for Council to address in reply – paragraph 4.
- 1.4 Attached to this reply evidence is **Appendix A** which includes a copy of my working as it pertains to (c) above and as set out in section 4 below.

2. MR FARRELL’S WRITTEN RESPONSE (WAYFARE LIMITED AND CARDRONA ALPINE RESORT LIMITED)

- 2.1 I respond specifically to aspects of paragraphs 5 and 10 of Mr Farrell’s Supplementary Planning Evidence (24 August 2020).
- 2.2 Setting aside the first part of Mr Farrell’s paragraph 5 (that questions “*whether Policy 3.3.8 accords with the NPSUD*” – I address this in Section 5 below regarding Minute 35), Mr Farrell finds no evidence that Council “*demonstrated that there is sufficient land*

1 Dated 18 March 2020.

2 Dated 12 and 19 June 2020.

supply/capacity for urban based commercial recreation activities (nor has it demonstrated that any available land passes the competitive margin thresholds in Policy 3.22 of the NPSUD 2020)”.

2.3 I wish to clarify the following for the Panel:

- (a) The Business Development Capacity Assessment 2020 (Appendix B of my EIC) (**BDCA**) does incorporate projected demand for commercial recreation activities occurring in the urban environment in the underlying models. The demand model focusses only on projected employment growth anticipated to locate in the urban environment and within business enabled zones. It considers demand between 2018 and 2048 from 48 aggregate industrial sectors (that cover the total economy), of which commercial recreation activities fall within the Arts and Recreation Services sector³.
- (b) The BDCA incorporates capacity for ‘large utilitarian designed buildings’ (i.e. warehouse type structures) for commercial recreation activities and many other activities/sectors that occupy such buildings in relevant zones. For example, I understand that the Business Mixed Use Zone (**BMUZ**) permits commercial recreation activities. The BMUZ enables warehousing type buildings to be developed on vacant land.
- (c) It is true that the BDCA has not specifically “*demonstrated that there is sufficient land supply/capacity for urban based commercial recreation activities*”. The BDCA is not required to assess or report sufficiency at a building typology, individual sector or individual zone level to meet the MfE guidelines. It assessed sufficiency for the combined total of industrial, commercial and retail demand and the combined total of capacity for each category.
- (d) If total capacity equals total demand over time, then it may be likely that demand by all individual activities can be met by capacity across the various business enabled zones, but

³ For example, the BDCA demand model projects district wide employment growth in the Arts and Recreational Services Sector of 205 jobs in the medium-term and 315 jobs in the long-term, with approximately 57% of this employment growth oriented towards urban business zones (i.e. 116 jobs in the medium-term and 177 jobs in the long-term). This demand is then translated into land area and GFA in the model by the expected mix of building typologies occupied by that sector. That demand has a margin added to it (in accordance to the NPS-UDC and now NPS-UD). That is contrasted with capacity of different zones to deliver each building typology.

there is no certainty from the published aggregate results that any one activity will have sufficient capacity in the zones it is limited to. If there is more than sufficient capacity relative to demand (i.e. a surplus) then it is more likely that demand for any one activity can be met within zones where it is plan enabled (but still no absolute guarantee without examining demand and capacity at an activity and zone level). However, the risk of insufficient data/uncertainty is mitigated when activities are provided for in the district plan across multiple zones and multiple locations and when vacant capacity also exists across multiple zones and multiple locations. I believe that the BDCA demonstrates that outcome.

- (e) Section 4 of the BDCA appended to my EiC shows the sufficiency results of the Decisions Version of the PDP.
 - (i) The results do include the 'competitive margin thresholds' as required by the NPS-UJC/UD.⁴
 - (ii) Figure 8 shows that across the total district there is estimated vacant commercial land in the urban environment of 249ha to meet long term commercial land demand of 49ha (Maximum Capacity Scenario), which is a significant surplus.
 - (iii) Figure 10 shows that across the total district there is estimated vacant commercial land in the urban environment of 184ha to meet long term commercial land demand of 49ha (Alternate Capacity Scenario which removes overlap of capacity between categories based on likely market supply assumptions), again a significant surplus.
- (f) The surplus for urban commercial development capacity is equally significant under the Stage 3 proposed zone changes.

4 National Policy Statement on Urban Development Capacity (2016) and National Policy Statement on Urban Development 2020.

2.4 In paragraph 10 of Mr Farrell's supplementary evidence he states that "*it is unclear whether these zones [BMUZ and Remarkables Park Special Zone] provide sufficient land supply/capacity and pass the competitive margin thresholds*". In his experience he considers that there is insufficient capacity in these zones to accommodate commercial recreation activities that occupy large utilitarian designed buildings.

2.5 My evidence is that, notwithstanding the limitations of the BDCA, based on the BDCA results that have been reported, and my knowledge of the detailed underlying models, that an insufficiency of capacity in zones that enable commercial recreation, is unlikely. Commercial recreation activities comprise a small share of the total 49ha of commercial land demand focussed on urban business zones. Urban business zones that enable commercial recreation activities form a subset of total urban Commercial vacant land capacity. The ODP Remarkables Park Special Zone and the BMUZ are two such zones and have large amounts of vacant commercial land area at present, as shown in Figure 3 of Appendix B of my EiC. Vacant capacity in the BMUZ is estimated at 10.5ha, spread across a number of locations in the District. There is an estimated 61.2ha of total vacant commercial land in Remarkables Park (with commercial recreation activities a controlled activity in all but one activity area).

3. SUPPLEMENTARY STATEMENT OF MR DEVLIN & MR BALLINGALL (TRL)

3.1 The supplementary statement⁵ was prepared by TRL in response to a request from the Panel to demonstrate the "*cumulative effect*" of the TRL submission on vacant industrial land capacity in Wanaka, if the proposed rezoning requested by TRL was to be accepted in full.

⁵ Dated 13 August 2020.

3.2 The cumulative analysis is summarised in the statement at Figure 2. I have several concerns with the analysis provided by Mr Devlin/Mr Ballingall as follows:

- (a) The left hand side of the graph (identified as 'From the BDCA⁶') seeks to establish the starting point from which the cumulative effect of the TRL submission can then be shown in terms of additions and subtractions of vacant capacity in the General Industrial Zone (**GIZ**) (the middle part of the graph: 'TRL's Proposal'). However, the left hand side of the graph does not reflect the correct starting point. This should be the vacant capacity (including developable area only for greenfield sites) of the notified GIZ.
- (b) While the analysis relies on some figures from my EIC/BDCA on estimated vacant capacity,⁷ as shown in Table 4 of my EIC, they have not included the Three Parks and TRL owned site capacity as part of the notified GIZ. The left hand side of the graph reaches only 15.6ha as the starting point which under-represents the notified vacant capacity of the GIZ as reported in the BDCA. I explain this further below.
- (c) To show the cumulative effect of the TRL submission, the graph removes 2.7ha of vacant GIZ capacity in Three Parks in the central part of the graph. It is not clear how 2.7ha of vacant capacity notified GIZ in Three Parks was reached. By way of contrast, the BDCA estimates 5.4ha. Irrespective of how TRL arrived at 2.7ha, the equivalent value should also be included in the notified GIZ capacity on the left hand side of the graph as part of the baseline starting point.
- (d) The analysis also needed to include the 6.1ha of TRL site notified as GIZ on the left hand side of the graph⁸.
- (e) When these two corrections are made, the starting point of vacant capacity notified GIZ on the left hand side of the graph should be 24.3ha and not 15.6ha as shown. This

6 Business Development Capacity Assessment (BDCA) – in this case the BDCA Interim Update 2020 appended to my EIC.

7 The BDCA estimated vacant capacity as at January 2020 and according to conventions on how a site was deemed 'vacant' (set out in the BDCA 2018).

8 Capacity of 6.1ha of developable land area in the TRL owned site is consistent with the BDCA and Table 4 of my EIC.

result is based on TRL's stated estimate of capacity for Three Parks.

- (f) By comparison, my evidence (Table 4 EiC on page 45) shows a notified starting point of 27.1ha of GIZ capacity according to the results of the BDCA. My starting point is higher because of the higher Three Parks estimate only.
- (g) The graph adds (light blue bar) GIZ capacity to the baseline starting point on the Wastewater Ponds site (roughly half of the operative Ballantyne Mixed Use Zone) as shown in their submission (+11.9ha). The 11.9ha may have been taken from footnote 50 of my EiC (which applied to the whole of the operative Ballantyne Road Mixed Use Zone potentially available for industrial land use), or they may have measured the gross area of the GIZ site as per their submission map (I get approximately 11.15ha using GIS software so maybe they measured it slightly differently to get 11.9ha). Either way, 11.9ha is incorrect.
- (h) All other figures that TRL have relied in their graph (including sourced directly from the BDCA) relate to developable land area and not the gross zone area. This needs to be maintained for consistency. As a greenfield site, 11.9ha includes future roads/access areas. Indicatively, if 25% of the proposed gross GIZ area in the Wastewater Ponds site was removed for roads, then the approximate vacant and developable GIZ capacity of this site would be around 8.4ha and not 11.9ha. Even 8.4ha may be generous.

3.3 The cumulative result of TRL's proposal in the graph (following the subtraction of the last green bar) reaches 17.4ha of vacant capacity in the GIZ (as stated in TRL's paragraph 7). The right hand side of the graph subtracts the long-term demand for industrial land as per the BDCA (12.3ha in the red bar). The result is a long-term surplus of industrial capacity of 5.1ha.

3.4 With the corrections in approach outlined above, I believe the surplus TRL should have reached is 10.3ha, not 5.1ha.

- 3.5** By comparison, my EiC presented a cumulative assessment of the full TRL submission in paras 16.15-16.21. My analysis consistently applied the results of the BDCA, including a consistent approach to defining vacant capacity (as at January 2020). The key difference in my approach is that I did not quantify the impact of the Wastewater Pond site identified as GIZ in their submission, but rather qualified this additional GIZ capacity in paragraph 16.21. Also, my graph (Figure 12 EIC) does not reflect my footnote 48. My analysis in Figure 12 of my EiC quantified a surplus of 0.7ha which then needed to take account of the addition of the Wastewater Ponds site and the caveat in Footnote 48. Indicatively, if those two areas were now included, my result would be a surplus of vacant industrial capacity in the GIZ of 9.5ha as a result of the TRL submission.
- 3.6** Whether you use TRL's corrected approach or my own (I have included a copy of my calculations in **Appendix A** of this right of reply statement), the surplus of GIZ vacant capacity in Wanaka is around 10ha if you apply the TRL submission to the notified GIZ (and do not account for any other decisions on GIZ re-zoning). The surplus is not 5.1ha as reached in the TRL analysis of their supplementary statement.
- 3.7** Clearly, the developable 8.4ha of the Wastewater Ponds site accounts for the majority of that (approximately) 10ha surplus. In paragraph 16.19 of my EiC I identify some of the risks of relying on that long-term surplus.

4. MR BALLINGALL'S RESPONSE TO QUESTIONS OF THE PANEL (TRL)

- 4.1** On the issue of the benefit of having industrial and service activity in an accessible location within the urban environment, at the Hearing Mr Ballingall stated that the same and equal benefit applies to having business and retail activity in an accessible location within the urban environment, thus supporting his view that the TRL owned site should be zoned BMUZ instead of GIZ.
- 4.2** It *is* appropriate that a well-functioning urban environment should provide good access to industrial, retail, office, commercial,

recreational, community, medical and many other activities. This rationale is not however sufficient to justify substitution of the TRL site to BMUZ if the consequence of that substitution is needing to find new and discrete locations for the GIZ beyond the urban growth boundary sooner than would otherwise be the case.

- 4.3** It is my evidence that for a market the size of Wanaka (and its surrounding catchment), greater economic efficiency and benefits will be achieved from consolidating industrial and service activity in its current location over the long-term future compared to an outcome where that activity is potentially spread over two (or more) locations in order to meet future demand. The greenfield capacity of the TRL owned site helps achieve that outcome for the GIZ.
- 4.4** The Panel asked Mr Ballingall why zoning the TRL site GIZ would not be a socially efficient outcome. Mr Ballingall responded that it would not be efficient to leave the TRL land idle, which he suggests would be the case if zoned GIZ. It was his evidence that if the TRL site was instead BMUZ it could be used to create jobs and support GDP in the short-term.
- 4.5** In my view, achieving economic growth should not be at the expense of good planning outcomes (and a well-functioning urban environment). It is possible to achieve both.
- 4.6** Zoning the TRL site BMUZ would not stimulate a net increase in projected economic growth in Wanaka, in my view. The businesses/jobs that Mr Ballingall envisages on the TRL site if zoned BMUZ can be accommodated in other existing and proposed zones (including the BMUZ) where there is more than sufficient vacant and competing capacity relative to projected demand growth according to the BDCA. Zoning the TRL site BMUZ would provide another location option for those business (i.e. employment growth spread over one more zone area), with all locations potentially growing slower as a result. While the NPS-UD encourages a competitive market, the advantages of a marginal increase need to be weighed up with the disadvantages of reducing long-term consolidation of industrial, service and trade supply activity.

- 4.7** There is projected demand for industrial, service and trade supply land in the Wanaka Ward as set out in my Industrial Report⁹, BDCA and EiC. Enterprise Drive is an example of that (under the provisions of the operative Industrial B zone). From my observations, sites currently under construction in that subdivision (or recently completed) appear to be industrial, service and trade supply in nature. The consented industrial and service activity in the Rural Zone south of the Wastewater Ponds on Ballantyne Road (an area now being proposed for GIZ) is another example of recent industrial and service land demand in this catchment. There is no reason to expect that this type of demand growth will cease in the long-term.
- 4.8** The NPS-UD reinforces that councils need to think long-term and that it is appropriate to allocate land resources for long-term uptake – firstly within district plans and then in future development strategies where this supports well-functioning urban environments. I consider that zoning the TRL site GIZ is consistent with the objective and policies of the NPS-UD.
- 4.9** On the matter of land prices, Mr Ballingall stated that rising land values are a signal of strong demand (a positive sign). He stated in the hearing that I had implied that rising land values are a bad thing.
- 4.10** I have examined land value rises in operative industrial zones in the district in my Industrial Report. The key cause of the price rises is strong demand for retail, office and commercial activities in non-centre locations. This is not to say that there is not demand for industrial and service activities in industrial zones, just that that price signals of that market are masked by higher value competing demand.

⁹ Economic Assessment of Queenstown Lakes District's Industrial Zones – Stage 3 District Plan Review, May 2019 by Market Economics Ltd ('Industrial Report'). This report was attached to the Section 32 report for the General Industrial Zone.

4.11 I consider that the Council has responded to the price 'signals' in the PDP in two ways:

- (a) Created the BMUZ and increased the number of locations where this is applied (including new urban areas). This helps to respond to the price signal associated with demand for commercial, retail, etc activity in non-centre locations.
- (b) At the same time, they have proposed the GIZ. It is important to provide for industrial and service activities in this economy to support a well-functioning urban environment. Council are using the current price signals evident in the operative industrial zones to recognise the decreasing sustainability of industrial and service activities in a permissive zoning regime and the timeliness of regulatory intervention to better provide for those activities in appropriate locations within the urban environment. I maintain that rising prices are a 'bad thing' if they hinder a sector of the economy which supports a well-functioning urban environment.

4.12 The philosophy of the NPS-UD is to drive down land prices to increase affordability (and sustainable growth). The GIZ achieves that through provisions that direct higher value activities to other zones. The PDP is a chance to help reset many price signals. If approved, the price signals of the GIZ will be monitored in the future (as required by the NPS-UD) to see if the capacity provided relative to demand specifically for that zone is both sufficient and efficient.

5. MINUTE 35 OF THE PANEL - PARAGRAPH 4

5.1 Minute 35 of the Panel, and specifically, paragraph 4, asks whether my position, as set out in my Summary Statement has changed in light of Objectives 3 and 6 and Policies 1, 2, 6 and 8 (in particular) of the NPS-UD. Paragraphs 6 and 7 of my Summary Statement are highlighted in Minute 35, with emphasis added. For the purpose of my reply, I have evaluated my paragraphs 6 and 7 separately below in Tables 1 and 2 respectively. The evaluation considers the broad intent of the paragraphs and the specific underlined wording.

Table 1 – Evaluation of Paragraph 6 of N. Hampson Summary Statement Against Selected NPS-UD Provisions

	<p>6. In my view a ‘surplus’ of capacity reported in the BDCA on its own is not a justification to take capacity from one land use and give it to another. Nor should a reported ‘surplus’ of capacity prevent Council from rezoning additional capacity where there are strategic benefits in doing so and the additional capacity materially enhances the functionality of urban areas/settlements in the <u>short-medium term</u>. Each site needs to be considered in the <u>local and wider context</u>.</p>
Objective 3	<p>No further changes to paragraph 6 in light of this objective. Objective 3 is intended to encourage intensification of urban areas in appropriate locations. Objective 3 is consistent with the intent of paragraph 6 to look at the local context.</p>
Objective 6	<p>In light of Objective 6 (b), I would modify the time period of decision making that delivers strategic benefits to the medium to long term. I.e. “in the <u>medium-long term</u>” as opposed to short-medium term.</p>
Policy 1	<p>Considering sites in the “<i>local and wider context</i>” is consistent with Policy 1 in that a well-functioning urban environment requires decision makers to consider how land/zones work together as an integrated whole. That said, with regard to the GIZ in particular, I maintain that assessing demand and capacity at a district level is inappropriate given the way that the industrial economy is structured and functions spatially. Reference to “<i>wider context</i>” is intended to mean “<i>wider catchment context</i>” and not the district.</p>
Policy 2	<p>This policy is consistent with the intent of paragraph 6. Policy 2 validates the presence and provision of surplus capacity, including in the long-term. Read in conjunction with Objective 1 and Policy 1, surpluses may be appropriate where they ensure a well-functioning urban environment now and in the future.</p>
Policy 6	<p>No further changes to paragraph 6 in light of this policy.</p>
Policy 8	<p>No further changes to paragraph 6 in light of this policy. Policy 8 requires such plan change proposals to also achieve a well-functioning urban environment. This is the intent of paragraph 6 - that a surplus should not be the only consideration of a change of zoning. Clause (b) relates primarily to plan changes that bring forward future urban zones or areas identified in an FDS/spatial</p>

	plan for future urban growth – neither currently apply in this district.
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Table 2 – Evaluation of Paragraph 7 of N. Hampson Summary Statement Against Selected NPS-UD Provisions

	<i>7. While a reported ‘shortfall’ of industrial capacity in the BDCA in Queenstown does need to be addressed by Council, it is important that any decision is approached strategically in terms of long-term urban form outcomes. The BDCA is a key input to the Future Development Strategy (FDS)/Spatial Plan, which is intended to take a strategic long-term approach to the future growth of the District. <u>Council need only zone sufficient capacity to meet demand over the medium-term (i.e. next 10 years) and identify long-term growth areas in the FDS (i.e. to meet demand in the 10-30 years’ time).</u></i>
Objective 3	No further changes to paragraph 7 in light of this objective.
Objective 6	As above, with reference to decisions that achieve strategic outcomes I would now extend the time frame in sentence 1 to include medium term (i.e. “ <i>approached strategically in terms of <u>medium-long term urban form outcomes</u></i> ”). The intent of paragraph 7 is to take a strategic approach to address a potential long-term shortfall of industrial capacity. This is consistent with Objective 6 (b).
Policy 1	No further changes to paragraph 7 in light of this policy.
Policy 2	The intent of the last sentence (underlined) in paragraph 7 is to clarify the role of the district plan and the FDS and how these two planning documents work together to zone and identify capacity over the long-term. The approach is consistent with the NPS-UD which clarifies that short term capacity is limited to operative zones, medium term capacity can also include (cumulatively) net additional capacity proposed in a notified PDP and long term capacity can also include (cumulatively) net additional capacity identified in an FDS. As Council do not yet have a published spatial plan/FDS, any new urban areas identified in that planning document will be net additional to the capacity identified in the HDCA 2018 and BDCA 2020. That said, the NPS-UD, including Policy 2, introduces the idea of providing sufficient capacity as a minimum requirement. For consistency, the last sentence of paragraph 7 should be reworded to state: “ <i>Council need only <u>as a</u></i>

	<i><u>minimum</u>) zone sufficient capacity to meet <u>expected demand plus a competitive margin</u> over the medium-term (i.e. next 10 years) and identify long-term growth areas in the FDS (i.e. to meet <u>expected demand plus a competitive margin</u> in the 10-30 years' time)."</i>
Policy 6	No further changes to paragraph 7 in light of this policy.
Policy 8	No further changes to paragraph 7 in light of this policy. Paragraph 7 was not intended to preclude any other matters that decision makers may wish to have regard to when achieving a well-functioning urban environment.

Natalie Dianne Hampson

4 September 2020

APPENDIX A

Working on Cumulative Effect of TRL Submission – Recommended Corrections and Comparison with N Hampson Calculations and Evidence

		Supplementary Version		Correct Ponds Site Est		Corrects base line to balance		NH EIC Version		NH EIC Version with footnote 48 and Ponds Site Quantified	
From BDCA	Industrial	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5	1.5
	Industrial B	1.0	2.5	1.0	2.5	1.0	2.5	1.0	2.5	1.0	2.5
	Industrial B Ballantyne Ridge **	4.7	7.2	4.7	7.2	4.7	7.2	4.7	7.2	4.7	7.2
	New GIZ Ballantyne Road	8.4	15.6	8.4	15.6	8.4	15.6	8.4	15.6	8.4	15.6
	TRL Site	-	15.6	-	15.6	6.1	21.6	6.1	21.6	6.1	21.6
	Three Parks	-	15.6	-	15.6	2.7	24.3	5.4	27.1	5.4	27.1
TRL Submission Changes	Old Waste Water Ponds (Addition to GIZ)	-	11.9	8.4	23.9	8.4	32.7	-	27.1	8.4	35.4
	TRL Site (Subtraction of GIZ)	-	6.1	21.4	17.9	6.1	26.6	-	6.1	6.1	29.4
	Three Parks (Subtraction of GIZ)	-	2.7	18.7	15.2	2.7	23.9	-	5.4	5.44	23.9
	26 Gordon Rd 1 Frederick Street (Subtraction of GIZ)	-	0.5	18.2	14.7	0.5	23.4	-	1.5	1.1	22.8
	DP 368381 + 20 Frederick St + 5 Connell Tce	-	0.8	17.4	13.9	0.8	22.6	-	1.0	1.0	21.8
	Long-Term Projected Demand		-12.3		-12.3		-12.3		-12.3		-12.3
	Surplus/Shortfall		5.1		1.6		10.3		0.7		9.5