

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF the Queenstown Lakes Proposed District
Plan
Submissions and Further Submissions
on:
Chapter 1 – Introduction

**STATEMENT OF EVIDENCE BY LOUISE TAYLOR ON BEHALF OF
PENINSULA BAY JOINT VENTURE (378 and 1336)**

(26 FEBRUARY 2016)

1. INTRODUCTION

Qualifications, Experience and Code of Conduct

- 1.1 My name is Louise Elizabeth Robertson Taylor. I hold a Bachelor's degree in Geography and a Master's degree in Regional and Resource Planning from the University of Otago (completed in 1996). I am a full member of the New Zealand Planning Institute. I am a Partner and Director of the firm Mitchell Partnerships Limited, which practices as an environmental consultancy nationally, with offices in Dunedin, Auckland and Tauranga.
- 1.2 I have been engaged in the field of resource and environmental management for 19 years. My experience includes a mix of local authority and consultancy resource management work. This experience has included particular emphasis on providing consultancy advice with respect to resource consent and environmental impact assessments, regional and district plans, and designations. This includes extensive experience with large-scale projects involving inputs from a multi-disciplinary team. I hold the Chair accreditation to hear RMA applications and have sat on several hearings panels for resource consent applications.
- 1.3 I have prepared submissions on proposed Regional Policy Statements and Regional Plans throughout New Zealand and have prepared resource consent applications for various activities under almost all district and city plans in the South Island and many in the North Island. A summary of my recent experience is included at **Appendix A**.
- 1.4 While I appreciate that this is not an Environment Court hearing, I confirm that I have read and agree to comply with the Code of Conduct for expert witnesses contained in the Environment Court Practice Note dated 1 December 2014. Unless I state otherwise, this evidence is within my scope of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions I express. I understand it is my duty to assist the hearing committee impartially on relevant matters within my area of expertise and that I am not an advocate for the party which has engaged me.

Introduction to PBJV

- 1.5 Peninsula Village Limited and Wanaka Bay Limited (collectively referred to as Peninsula Bay Joint Venture or PBJV) own land at the northern extent of Peninsula Bay Wanaka.

- 1.6 Infinity Investment Group (Infinity) manage and develop PBJV's landholdings at Peninsula Bay.
- 1.7 PBJV, in association with Infinity, have recently lodged a private plan change application with the Queenstown Lakes District Council (QLDC) to extend the current Low Density Residential Zoning at Peninsula Bay. The private plan change application (referred to as Plan Change 51 or PC51) seeks to alter Map 19 the Operative District Plan.
- 1.8 Concurrently, PBJV has also lodged a submission with respect to the Proposed Queenstown Lakes District Plan (the Proposed Plan) seeking that Proposed Map 19 be amended.
- 1.9 As this hearing relates to the Introduction of the Proposed Plan, I do not intend to discuss the proposed rezoning request in any detail today. A fuller brief of evidence with respect to PC51 will be provided at the relevant rezoning request hearings later this year.
- 1.10 PBJV intends to present evidence at the forthcoming hearing of submissions on Chapter 3 Strategic Direction, Chapter 4 Urban Development and Chapter 6 Landscapes. An overview of the PC51 will be provided at these hearings to provide background context for the Panel.
- 1.11 I therefore request that the following brief of evidence be tabled and duly considered by the Panel at the hearing of submissions on Chapter 1 of the Proposed Plan. I am available to answer questions from the Panel if required.

Comment on the Introduction Chapter

- 1.12 PBJV lodged a single further submission with respect to the Introductory Chapter of the Proposed Plan.
- 1.13 Section 1.6.15 to 1.6.18 of the Proposed Plan relate to the notification of applications. Specifically, these sections state:

"1.6.15 The Council may decide whether to publicly notify an application for resource consent for an activity.

1.6.16 Council must publicly notify the application if:

- It decides that the activity will have or is likely to have adverse effects on the environment that are more than minor; or,*
- The applicant requests public notification; or,*

- A rule in the Plan, or National Environmental Standard (NES) requires public notification.
- 1.6.17 Despite the above, Council must not publicly notify the application if;
- A rule in this Plan, or NES standard precludes public notification of the application; and,
 - The applicant has not requested public notification.
- 1.6.18 Despite the above, Council may publicly notify an application if it decides that special circumstances exist in relation to the application.”

1.14 With respect to Section 1.6.18, the Upper Clutha Environmental Society Inc (submitter 145.17) sought further clarification around when notification will be required for applications affecting outstanding natural landscapes and outstanding natural features. Specifically, they sought that Section 1.6.18 be amended as follows (underlines show additions):

Despite the above, Council may publicly notify an application if it decides that special circumstances exist in relation to the application. In the case of subdivision and/or development within Outstanding Natural Landscape or on Outstanding Natural Features non-notification will only occur in very exceptional cases.

1.15 PBJV lodged a further submission in opposition to this change. PBJV reasoned that the proposed new sentence would inappropriately trigger notification of very minor developments such as the upgrade of existing utilities or the maintenance of roads. This would result in an inefficient and resource intensive manner in which to manage applications within ONFs and ONLs.

1.16 The section 42A report recommends rejecting the relief sought by the Upper Clutha Environmental Society Inc and accepting the relief of PBJV. I consider this to be appropriate and consider that the changes sought by the Upper Clutha Environmental Society Inc would potentially create unduly onerous notification requirements for applications where the effects may be less than minor.

Louise Taylor
26 February 2016

APPENDIX A

Summary of Recent Project Experience

- Preparation of various resource consent applications and consent notice variations for the development of a sustainable life style farm at Ayrburn, Lake Hayes.
- Provision of resource management advice, including the preparation of resource consent applications and the management of specialist experts for various residential, subdivision and commercial activities in Central Otago and the Queenstown Lakes, including Bendemeer, Damper Bay and Roys Peninsula.
- Planner advising the Board of Enquiry for New Zealand Transport Agency's Basin Bridge project involving notice of requirement and resource consents, Wellington, including hearing appearance in front of the Board and expert witness conferencing.
- Preparation of Plan Change 50, to extend the town centre in Queenstown on behalf of Queenstown Lakes District Council.
- Preparation of Plan Change and s32 report and presentation of planning evidence for extension of Marina Zone and introduction of Mooring Management Areas in Waikawa Bay, Marlborough on behalf of Port Marlborough.
- Planner advising the Board of Enquiry for New Zealand Transport Agency's Christchurch Southern Motorway notice of requirement and resource consents, Canterbury, including hearing appearance in front of the Board and expert witness conferencing.
- Sole Hearing Commissioner for water take application for irrigation purposes for Southland Regional Council.
- Commissioner for Invercargill City Council's stormwater discharge permit, on behalf of Environment Southland.
- Presentation of planning evidence to the Board hearing Plan Change 3 to the Waitaki Catchment Water Allocation Regional Plan, on behalf of Waitaki Irrigators Collective Limited and others.
- Presentation of planning evidence for Plan Change 6A to the Otago Regional Water Plan on behalf of Waitaki Irrigators Collective Limited and others.

- Preparation of various resource consent applications on behalf of Otago Regional Council for structures to control flood risk.
- Preparation of proposed private plan change to create a Mercy Hospital Zone, and presentation of planning evidence, on behalf of Mercy Hospital, Dunedin.
- Preparation of various resource consents for works at Mercy Hospital, on behalf of Mercy Hospital, Dunedin.
- Preparation of resource consent application for a multi level carparking building at Wellington Airport, and a café within the Wellington Airport Retail Park, on behalf of Wellington Airport Limited.
- Preparation of resource consent applications and hearing attendance for commercial re-development of heritage buildings in Dunedin.
- Presentation of planning evidence for a child care centre in Dunedin.
- Preparation of plan change to extend Peninsula Bay low density residential zone in Wanaka, on behalf of Peninsula Bay Joint Venture.
- Preparation of various resource consents for retirement villages in Canterbury on behalf of Ryman Healthcare Limited.
- Preparation of resource consent application for Observatory Retirement Village, Oamaru on behalf of Waitaki District Health Limited.
- Preparation of resource consent applications for a student accommodation facility at Logan Park, Dunedin on behalf of Dunedin City Council, Ngai Tahu Property Limited and Otago Polytech.
- Preparation of numerous submissions to proposed district and regional plans and policy statements, along with plan changes and variations on behalf of clients Nationally.
- Provision of resource management advice, including the preparation of resource consent applications and the management of specialist experts for various residential, subdivision and commercial activities in Central Otago and the Queenstown Lakes, including Bendemeer, Damper Bay and Roys Peninsula.

- Preparation of Assessment of Environmental Effects, including management of a team of specialist inputs for a Concession application from the Department of Conservation for a monorail linking Queenstown and Te Anau Downs.
- Project managing the process for obtaining Environment Canterbury and Waimakariri District Council resource consents required to develop Pegasus, a new town in Canterbury, including the management of specialist inputs.