



## Form 5

### Submission on Proposed Queenstown Lakes District Plan – Variation to Chapter 21: Landscape Schedules

#### Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

Submitter: Alpine Deer NZ LP

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#### 1.0 Background:

1.1 Alpine Deer NZ LP (ADNZ)(the Submitter) own and operate a venison and deer velvet processing facility at 50 Church Road, Luggate (Lot 1 DP 18599 on Record of Title OT10A/222). ADNZ also own the Luggate Sawmill site at 60 Church Road (Lot 1 DP 20587 on Record of Title OT12A/505 and Lot 2 DP 20587 on Record of Title OT12A/506). Together ADNZ's landholding measures 2.65 hectares and includes multiple buildings and outdoor storage areas associated with rural industrial activities.

1.2 As part of Stage 1 of QLDC's District Plan Review the Rural Industrial Sub-Zone was created and applied to ADNZ's landholding at 50 and 60 Church Road.

- 1.3 The Rural Industrial Sub-Zone was subsequently extended through submissions on Stage 3 of the District Plan Review to cover approximately 8 hectares of the adjoining site to the north, owned by UCT Properties Ltd (UCT).
- 1.4 UCT are in the process of transitioning out of their long-established yard at Main Road, Luggate to their new site at Church Road with a large storage shed completed and operational and an additional storage, office, workshop and worker accommodation building currently under construction along with a consented fuel stop adjoining Church Road.
- 1.5 The land beyond the UCT site to the north east also includes a number of industrial activities such as truss and framing fabricators and electrical contractors.
- 1.6 The ADNZ site forms part of a Rural Character Landscape (as identified in Stage 1 of the Proposed District Plan) that extends to the north, south, west and east. The Outstanding Natural Landscape that encompasses the Clutha River and its margins is located approximately 100m to the east of the ADNZ site while Luggate Creek is located to the south.
- 1.7 The site and the wider area extending to the west forms part of the Church Road – Shortcut Road RCL Landscape Priority Area (reference 21.23.4).

**2.0 ADNZ’s submission relates to the following provisions of the Queenstown Lakes District Council’s Proposed District Plan:**

- 21.23.4 – Church Road – Shortcut Road RCL

**3.0 Without derogating from the generality of the above, ADNZ’s submission is that:**

ADNZ oppose the description of important land use patterns and features of the Church Road - Shortcut Road RCL PA

- 3.1 The Landscape Schedule of the Proposed District Plan acknowledges (at paragraph 12) the presence of ‘*A small area of industrial type land use near the Grandview Bridge*’. However, it is considered that the extent of industrial / rural industrial land use is greater than suggested in the landscape schedule. As mentioned above, there are several established industrial / rural

industrial land uses within the Landscape Priority Area. These established land uses are generally located on the east side of Church Road and include ADNZ's venison and deer velvet factory, the Luggate Sawmill, the UCT site and the industrial activities to the north. Collectively those activities cover an area of approximately 15.3 hectares and stretch along Church Road for approximately 950m. The ADNZ and UCT sites are located on land that is zoned Rural Industrial Sub-Zone. The 15.3 hectares of land covered by established and / or zoned industrial and rural industrial activities comprises approximately 10% of the Landscape Priority Area.

3.2 Most of the sites along the eastern side of Church Road are occupied by a number of large to medium sized buildings that are accompanied with the outdoor storage of materials and machinery. The approved consents for the UCT site include two large buildings, one 4,469m<sup>2</sup> and the other 4,630m<sup>2</sup>, as well as a fuel stop, truck wash and various other facilities associated with the transportation activity that will operate from the site in the future. Similar outcomes could occur on ADNZ's Rural Industrial Sub Zoned land immediately to the south (being the land currently occupied by the sawmill and factory).

3.3 These uses and buildings would interrupt the expansive 'rural' views from Church Road, noting that the identified Building Restriction Areas and specific Activity Areas are limited to the UCT site and do not apply to the ADNZ site. As such the landscaping requirements, reduced building heights and the limitations on the number of permitted buildings that apply to the UCT site do not apply to the ADNZ site. The ADNZ could therefore accommodate multiple 500m<sup>2</sup> buildings to a maximum height of 10m. So while the Pisa and Grandview ranges are and would continue to be visible from Church Road the Rural Industrial Sub-Zoning provides for rural industrial buildings to punctuate those views.

ADNZ **oppose** the description of important shared and recognised attributes and values for the Church Road - Shortcut Road RCL PA

3.4 The identified important shared and recognised attributes and values do not include acknowledgement of the suitability of land to the east of Church Road for industrial / rural industrial activities, having been identified as such in the Luggate Community Plan and reflected in the Rural Industrial Sub Zoning applied through Stages 1 and 3 of the Proposed District Plan. ADNZ have operated from their site since the 1960s and, like UCT, have a long

standing connection to the Luggate township, having supported it's growth and development for over 50 years.

ADNZ **oppose** the description of particularly important views to and from the area

- 3.5 The description of important views to and from the area (paragraphs 31 to 33) fails to acknowledge the established industrial and rural industrial land uses along the eastern side of Church Road, particularly in relation to views to the Grandview Range to the north east. Rather only reference is made to the rural and rural living uses in the area.
- 3.6 The industrial and rural industrial activities would also be seen in views from the river tracks as well as potentially the elevated portions of Luggate.

ADNZ **oppose in part** the description of naturalness attributes and values

- 3.7 While paragraph 34 correctly identifies that the existence of rural industry will somewhat compromise perceptions of naturalness it fails to acknowledge that the established industrial and rural industrial activities form part of the character of the area alongside the working rural character.

ADNZ **oppose** the description of remoteness/wilderness attributes and values

- 3.8 Paragraph 40 of the Landscape Schedule describes remoteness/wilderness attributes and values and includes *"Impressions of rural tranquility and quietness which are localized to parts of Church Road away from rural living and rural industrial uses..."*.
- 3.9 Church Road extends for 1.4km from State Highway 6 at its south western end to Shortcut Road / State Highway 8A at its north eastern end. The established and zoned rural industrial and industrial activities extend along the east side of Church Road for 950m with rural living to the south west and on the western side of the road. It is therefore unclear where the areas of rural tranquility and quietness might be located given that almost the entire length of Church Road is bounded by industrial, rural industrial and/or rural living activities.

ADNZ **oppose** the description of aesthetic qualities and values

- 3.10 The description of aesthetic qualities and values (paragraphs 41 and 42) fails to acknowledge the established industrial and rural industrial activities and zoning along Church Road.

ADNZ **oppose** the summary of Landscape Values

- 3.11 The summary of landscape values (paragraphs 43 to 45) fails to acknowledge the established industrial and rural industrial activities and zoning along Church Road, particularly in relation to physical and perceptual values.

ADNZ **oppose** the schedule of Landscape Capacity

- 3.12 The schedule of landscape capacity does not include any capacity rating for rural industrial buildings and/or activities. While rural industrial activities are not specifically listed as an activity for which landscape capacity should be defined under Strategic Policy 3.3.41 the policy makes it clear that the list of activities is not intended to be exhaustive and given the presence of the Rural Industrial Sub-Zone within the Landscape Priority Area it is a relevant consideration.

Conclusion

- 3.13 ADNZ submit that, as notified, the Schedule of Landscape Values does not adequately acknowledge or provide for the continuation and expansion of existing and approved industrial activities to the east of Church Road.

- 3.14 Overall ADNZ submit that the Schedule of Landscape Values of the Proposed District Plan:
- does not promote or give effect to Part 2 of the Act,
  - does not meet section 32 of the Act,
  - is contrary to the purposes and provisions of the Act and other relevant planning documents;
  - is inappropriate and inconsistent with the purpose and principles of the Act;
  - conflicts with and does not give effect to the higher order provisions of the Proposed District Plan; and
  - is not the most appropriate method for achieving the objectives of the Proposed District

Plan having regard to its efficiency and effectiveness, and taking into account the costs and benefits.

**4.0 The submitter seeks the following decision from the Queenstown Lakes District Council:**

4.1 That the Rural Industrial Sub-Zoned land at Church Road is excluded from the Landscape Priority Area.

4.2 If the Rural Industrial Sub-Zoned land is not removed from the scheduled area, that the landscape schedule for Church Road – Shortcut Road RCL is rewritten to better reflect and provide for the existing and zoned rural industrial activities along the eastern side of Church Road. In particular the descriptions of important land use patterns and features, shared and recognised attributes and values, particularly important views, naturalness and remoteness values and attributes should be amended to better acknowledge rural industrial activities.

4.3 That the schedule of landscape capacity is amended to address rural industrial activities and rural industrial buildings (being two distinct activities) within the Rural Industrial Sub Zone and the wider Landscape Priority Area.

4.4 That, given the permitted activity status of substantial buildings and associated rural industrial activities within the Rural Industrial Sub-Zone, a high landscape capacity for those activities should be identified for the Rural Industrial Sub-Zoned land.

**5.0 The submitter could not gain an advantage in trade competition through this submission.**

**6.0 The submitter wishes to be heard in support of their submission.**

**7.0 If others make a similar submission the submitter would consider presenting a joint case at a hearing.**



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**Scott Edgar (on behalf of Alpine Deer NZ LP)**

26 August 2022