

Before the Hearings Panel

In the Matter of the Resource Management Act 1991

And

In the Matter of the Proposed Queenstown Lakes District Plan – Stage 3

Brief of Supplementary Evidence on National Policy Statement on

Urban Development 2020 of **Hayley Jane Mahon** for

J C Breen Family Trust (submitter #3235)

The Breen Construction Company Limited (submitter #3234)

Alpine Nominees Limited (submitter #3266)

86 Ballantyne Road Partnership (submitter #3286)

NPR Trading Limited (submitter #3298)

Dated: 7 August 2020

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INTRODUCTION

1. My name is Hayley Jane Mahon. I hold the position of planner at John Edmonds and Associates. I have previously provided a written brief of evidence in relation to the relief sought by the submitters J C Breen Family Trust, The Breen Construction Company Limited, Alpine Nominees Limited, 86 Ballantyne Road Partnership and NPR Trading Limited.
2. In this supplementary brief of evidence I respond to the Stage 3 Hearing Panel's Minute 28, dated 27 July 2020 seeking comments on the differences between the National Policy Statement on Urban Development 2020 (NPS-UD) to come into effect on 20 August 2020 and its predecessor, the National Policy Statement for Urban Development Capacity 2016 (NPS-UDC).

NPS-UD

3. I consider that the NPS-UD builds on the NPS-UDC and does not provide any barrier to and supports the modification of the General Industrial Zone ('GIZ') provisions to allow for office, commercial and retail activities.
4. I have focussed this evidence on the Objectives and Policies in Part 2 of the NPS.

Objectives and Policies

5. I agree with Ms Scott in that a change in the NPS is the introduction of the "well-functioning urban environment" in Objective 1 and Policy 1. I note that at Policy 1(b), (c) and (d), well-functioning urban environments should have a variety of sites that are suitable business sectors in terms of location and size, which have good accessibility between housing and jobs and support development markets. If applied to the Ballantyne Road area, many sites have been subdivided to smaller sites which are unlikely to be suitable to a number of industrial activities (i.e. manufacturing, storage of goods), and the existing development market in Wanaka has determined the large volume and kinds of non-industrial activities which have situated themselves in this area. The NPS-UD says we need to support these development markets.
6. Objective 3 directs that district plans should enable more businesses and community services to be located in areas of an urban environment which are near a centre zone (e.g. the Wanaka Town Centre). The Ballantyne Road area has likely seen a change over the years from a more industrial area to a slow change to more commercial and office buildings being located here. These businesses have located themselves here to be amongst other compatible businesses and likely for the provision of parking and more space which the Town Centre does not afford. The Ballantyne Road area is still close enough to the Town Centre to be handy to residential areas but does not create the same adverse reverse sensitivity effects that the notified GIZ would.

7. Objective 4 reminds us that urban environments and amenity values develop and change over time. Originally there were yard-based service or industrial activities within the area currently known as Wanaka Town Centre, and over time as the Wanaka urban areas have progressively developed, those kinds of activities have moved further and further out of town. There are some of these yard-based activities in the Ballantyne Road area but that doesn't mean they should stay there forever. The timeline of Wanaka development has demonstrated these movements for service and industrial activities to move further and further away from residential activities. Objective 4 supports this pattern of development showing that amenity values of areas naturally change over time and the notified GIZ is running against that natural pattern.
8. In terms of Policy 2 and the requirement to ensure sufficient development capacity for short, medium and long term – this requirement was in the original NPS-UDC and so this is no change to include it here. Ms Hampson's evidence shows that Wanaka does have enough vacant land available for industrial use in the short, medium and long term with 37.99ha of land available in 2019¹ and so therefore why restrict the ability for the natural progression of the existing non-industrial use to develop in the area at Ballantyne Road that has an existing reasonable quantity of non-industrial use (e.g office and service activities)².
9. Policy 9 and the recognition of the principles of the Treaty of Waitangi is a new introduction to the NPS compared to the previous NPS-UDC.
10. Policy 10 and the direction for local authorities to work together when implementing the NPS. This is also a direction in the NPS-UDC. I consider that the neighbouring local authority, Central Otago District Council, should be consulted with when implementing the NPS. The Cromwell area is increasingly part of housing and labour market of Queenstown and Wanaka and could provide additional industrial land in the future which is well-connected to State Highways. Cromwell is no different to Queenstown and Wanaka as Ms Scott describes "...non-contiguous urban areas..." with "functional relationships"³.
11. An example of QLDC considering Cromwell as relevant to wider planning decisions is in the QLDC Spatial Plan consultation exercise (part of the Future Development Strategy that must be completed under the NPS-UDC and NPS-UD), Cromwell is included as part of the sub-region considered. See image below:

¹ Economic Assessment of Queenstown Lakes District's Industrial Zones 2019 by M.E Consulting,pg 92

² Economic Assessment of Queenstown Lakes District's Industrial Zones 2019 by M.E Consulting,pg 53

³ Memorandum of Counsel regarding National Policy Statement on Urban Capacity 2020 dated 31 July 2020 at 6.4(a).

Geographic extent

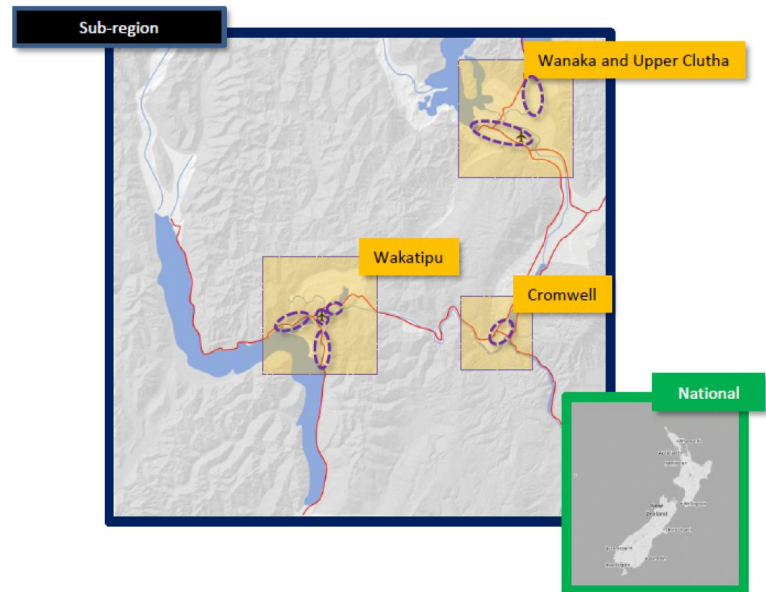


Figure 1: Geographic Extent, “Developing a Spatial Plan for the Queenstown Lakes District”. Dated October 2019

12. Policy 10 directs local authorities to engage with the development sector to identify significant opportunities for urban development. This policy was present within the NPS-UDC as well.
13. Policy 11 in relation to removing minimum car parking rate requirements was not in the NPS-UDC and has to be implemented with 18 months.

Implementation

14. Subpart 4 – The Future Development Strategy (FDS) requirement still remains in the NPS. I note under the NPS-UDC, this FDS was required to be completed by 31 December 2018. As described by Mr Place in his opening statements, the FDS is still being developed.
15. An additional requirement for the business development capacity assessment which wasn't included in the NPS-UD is the requirement for the capacity to be 'suitable' (3.29(2)) which includes suitability in terms of location and size. I have covered the suitability of non-industrial activities within the Ballantyne Road location above at paragraphs 6 and 7.

Conclusion

16. The NPS-UD continues the main themes of the NPS-UDC and supports the modification of the GIZ rules to allow for commercial, office and retail activities. The policies around providing sites for suitable business sectors in proximity to town centres and urban areas, amenity values of areas changing over time as a natural progression of development in urban areas and viewing Cromwell as relevant to wider planning decisions (i.e. the provision of future industrial areas) all support provision for non-industrial activities in the Ballantyne Road area.

A handwritten signature in black ink, appearing to read "H. Mahon", is centered at the top of the page. The signature is written in a cursive, flowing style.

Hayley Jane Mahon

7 August 2020