

Before Queenstown Lakes District Council

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In the matter of            The Resource Management Act 1991

And                            The Queenstown Lakes District Proposed District Plan Topic  
12 Upper Clutha Mapping

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**SUPPLEMENTARY BRIEF OF EVIDENCE**

**AND**

**SUMMARY OF EVIDENCE**

**OF DUNCAN WHITE FOR**

Sarah Burdon - Submission #282

**SUMMARY OF EVIDENCE FOR**

Glen Dene Ltd – Submission #384

Dated 6 June 2017

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1 My name is Duncan Lawrence White. I am a planner with Paterson Pitts Limited Partnership based in Wanaka. I produced planning evidence on the Proposed District Plan on behalf of:

- Sarah Burdon - submission #282 on the rezoning of the Hawea Campground;
- Glen Dene Ltd - submission #384 on the zoning of land around the Glen Dene Station homestead.

The following is a summary of that evidence and a response to issues raised in rebuttal evidence. Also included is a supplementary brief of evidence responding to Commissioner Nugent's Minute of 29 May 2017 relating to submissions seeking rezoning to an Operative District Plan zone.

### **Part A – Hawea Campground**

2 Submission #282 from Sarah Burdon seeks to have 22.7 hectares of the Hawea Campground including Pt Sec 2 Blk II - owned by Queenstown Lakes District Council (QLDC) and Lots 1 and 2 DP 418972 owned by Glen Dene Ltd, rezoned from Rural (partially overlain by designation 175 – for Motor Park) to Rural Visitor Zone (RV). I note that submission #384 from Glen Dene Ltd also seeks that the campground be rezoned to RV zone.

3 The submissions seek to rezone this land to recognise the existing campground use and to more appropriately and efficiently enable suitable development of the campground to upgrade the communal camp facilities and to provide a wider range of built visitor accommodation facilities. This rezoning would enable the construction or redevelopment of facilities to extend the camp season beyond the summer period and to provide long term economic benefits for Council as the landowner of the majority of the land and to the businesses of Hawea.

### **Supplementary Brief of Evidence – Submissions #282 and #384**

4 Commissioner Nugent's Minute of 29 May 2017 relates to submissions seeking rezoning to an Operative District Plan zone. This has arisen in the context of the S42A report for the Queenstown mapping component on the PDP. Para 4 of that Minute notes that *"... if a submitter seeks to zone the land using a set of provisions that are not one of the Stage 1 zones, that submitter would need to show how those provisions fit within the overall strategic directions chapters of the PDP. If the provisions do not give effect to and implement the strategic directions chapters, it would likely be difficult to conclude that they were the most appropriate way to achieve the objectives in those chapters."*

- 5 As a result of this minute the requests to rezone the Hawea Campground to RV zone has been assessed against the relevant objectives and policies of the S42A version of the proposed Strategic Directions chapter of the PDP as demonstrated below. Other objectives and policies in this chapter have also been considered but are not considered relevant to the submission.

<b>S42A Relevant Objectives and Policies</b>	<b>How does Rural Visitor Zone fit within Strategic Direction of the PDP?</b>
<p>Objective 3.2.1.4 - Recognise and provide for the significant socioeconomic benefits of <u>tourism activities</u> across the District.</p> <p>Policy 3.2.1.4.1 - Enable the use and development of natural and physical resources for <u>tourism activity</u> where adverse effects are avoided, remedied or mitigated.</p> <p><i>[note: emphasis added]</i></p>	<p>The Hawea Campground is an existing tourism and visitor accommodation facility. The PDP Rural zoning makes limited reference to the benefits associated with existing visitor accommodation facilities in the rural areas.</p> <p>The Rural zone provides for buildings for Visitor Accommodation use as a Discretionary Activity. A discretionary activity status does not provide a reasonable level of certainty that would enable the development of facilities for visitor accommodation.</p>
<p>Objective 3.2.1.5 - Enable the development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.</p> <p>Policy 3.2.1.5.1 - Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.</p>	<p>The submitter as the lessee of the Hawea Campground wishes to develop the campground to provide facilities that would allow a wider range of accommodation types and extend the current summer camping season to enable all year round use and upgrade the existing visitor facilities. This will enable a wider range of people to stay at the camp and over a longer period, rather than necessarily providing for more people during the peak late December – March period. People staying at the campground utilise the facilities in Hawea making such more sustainable. The RV zone clearly better provides for the camp to become more innovative and sustainable as well as diversifying the economic base of Hawea and creating employment opportunities.</p>
<p>Objective 3.2.1.6 - Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated.</p>	<p>The proposed RV zone clearly enables a diversification of land use (albeit that the campground already exists), provided that adverse effects can be managed. The management of these effects is described in a subsequent section.</p>
<p>Objective 3.2.1.7 - Maintain and promote the efficient and effective operation,</p>	<p>The Hawea Campground is a piece of community infrastructure. The RV zone better provides for the efficient and effective</p>

<p>maintenance, development and upgrading of the District's infrastructure, including designated Airports, key roading and communication technology networks.</p>	<p>development and upgrading of campground facilities.</p>
<p>Objective 3.2.4.5 - Preserve or enhance the natural character of the beds and margins of the District's lakes, rivers and wetlands.</p> <p>Policy 3.2.4.5.1 - That subdivision and / or development which may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins be carefully managed so that life-supporting capacity and natural character is maintained or enhanced.</p>	<p>The RV zone includes rules that require a setback of 6m from the zone boundary and 20m for visitor accommodation. This setback, when combined with the building coverage and height provisions, will assist in the protection of the natural character of the margins of Lake Hawea.</p>
<p>Objective 3.2.4.7 - Facilitate public access to the natural environment.</p> <p>Policy 3.2.4.7.1 - Opportunities to provide public access to the natural environment are sought at the time of plan change, subdivision or development.</p>	<p>An RV zoning would enable the provision of visitor accommodation facilities that enhance public access to Lake Hawea.</p>
<p>Objective 3.2.5.1 - Protect the quality of the Outstanding Natural Landscapes and Outstanding Natural Features from subdivision, use and development.</p>	<p>See assessment for Objective 3.2.4.5 (above). I note that the landscape assessments consider the majority of the submission site to have the ability to absorb additional campground buildings without degrading natural character, coherence, legibility or visual qualities.</p>

- 6 As a result of the above assessment I consider that the RV zone would give effect to and implement the relevant PDP Strategic Direction objectives and policies.

**Summary of Evidence**

- 7 Submissions #282 (Sarah Burdon) and #384 (Glen Dene Ltd) seek to rezone the existing Hawea Campground and adjacent land owned by Glen Dene Station (the lessees of the campground) from Rural to RV zone.
- 8 My evidence modifies and refines the relief to incorporate a new Rural Visitor Zone area – the Hawea Campground - within Chapter 12.3 of the Operative

District Plan. Revised provisions are proposed to apply specifically to the Hawea Campground. These provisions have been specifically designed to address concerns about the type and scale of development provided for in the Rural Visitor zone and to preserve the lower density, open space and relaxed lakeside character of the Hawea Campground dominated by mature trees. The height plan included in the submission is sufficiently detailed to define the proposed height limits and is geographically referenced.

- 9 This evidence considers the proposed rezoning against the requirements of Sections 32 and 32AA of the Act. It is considered that the Rural Visitor zone objectives and policies are more appropriate to achieve the sustainable management of natural and physical resources in the submission area than those of the proposed Rural chapter and would be efficient and effective in achieving the objectives and policies of the Strategic Directions chapter of the PDP as well as sustainable management.
- 10 I note that the landscape architects (Ms Mellsop for the Council and Mr Espie for the submitter) agree the majority of the submission area has the ability to absorb additional campground buildings and development as a result of the existing facilities, the vegetation cover and the proximity to Hawea township.
- 11 Mr Barr's rebuttal includes comments on infrastructure. The proposed 7% total building coverage indicates that intensive commercial accommodation development is not anticipated at the campground. Any proposed development will require connections to water supply (including firefighting) and these may entail upgrades to the water supply system. These can be designed and funded as part of any development on the campground. It is likely that wastewater will be treated and disposed of onsite. This is also a matter for detailed design at development stage, although the possibility of connecting into the reticulated wastewater system has been noted. Traffic upgrades to the internal camp layout will be required as the camp develops, these are also a specific design matter.
- 12 The proposed provisions avoid inappropriate development within the ONL and on the margins of Lake Hawea and are considered to appropriately avoid, remedy, or mitigate against adverse landscape effects, landscape character and visual amenity. It is considered that there will be limited adverse environmental effects, no cultural effects and social and economic benefit benefits arising from the proposal.
- 13 The risks of acting or not acting have also been considered. It is considered that there is very limited uncertainty and sufficient information in order to make a decision on the submissions. Any risk associated with the rezoning sought is very low as it is an existing zoning modified to suit particular site characteristics

and desired outcomes in an area where this activity already occurs and has for some decades.

- 14 As a result of the above it is sought that the submission and the modified Rural Visitor zone provisions be adopted for the Hawea Campground.

**Part B – Glen Dene Homestead**

- 15 Submission #384 seeks to have 13 hectares in the area of the Glen Dene Homestead rezoned from Rural zone to Rural Lifestyle zone. The S42A landscape assessment recommended that the proposed no build area be extended south to cover the open slopes adjacent to Lake Hawea and this recommendation has been accepted.
- 16 It is considered that the objectives from the Rural Residential and Rural Lifestyle chapter (section 22) of the PDP are appropriate to achieve the sustainable management of natural and physical resources in the submission area around the Glen Dene homestead and would be efficient and effective in achieving the Strategic Direction and Landscape objectives of the Proposed District Plan.
- 17 The risks of acting or not acting have also been considered. It is considered that there is very limited uncertainty and sufficient information in order to make a decision on the submissions. As the RL zoning is an existing ODP zoning the risk associated with the zoning sought is very low.
- 18 As a result of the above it is sought that the submission be adopted and the land within the submission area be zoned Rural Lifestyle with the lake margin of the submission area be protected by a Building Restriction Area.

**Dated this 6th day of June 2017**

**Duncan White**