

**BEFORE THE HEARING COMMISSIONERS  
AT QUEENSTOWN**

**IN THE MATTER** of the Resource Management Act 1991  
**(RMA or the Act)**

**AND**

**IN THE MATTER** of the proposed the Queenstown Lakes  
District Plan pursuant to Part 2 of the First  
Schedule to the Resource Management  
Act 1991

**ON BEHALF OF** Millbrook Country Club Ltd  
  
Bridesdale Farm Developments Ltd  
  
Winton Partners Fund Management No 2  
Ltd

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**STATEMENT OF EVIDENCE OF DANIEL WELLS**

**29 February 2016**

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## **INTRODUCTION**

### **Qualifications and experience**

1. My name is Daniel Garth Wells. I am a planning consultant based in Queenstown and am employed by John Edmonds and Associates Ltd. My qualifications are a Bachelor of Resource and Environmental Planning (Hons) and a Post Graduate Diploma in Development Studies, both from Massey University. I have over 11 years' experience in planning, in New Zealand and the United Kingdom.
2. I worked for the Queenstown Lakes District Council from February 2007 until September 2010. In that role I was (amongst other matters) involved in:
  - (a) monitoring of the current District Plan;
  - (b) preparing plan changes;
  - (c) non-statutory community planning exercises (such as the Wanaka Structure Plan 2007);
  - (d) population and dwelling projections; and
  - (e) running and revising Council's Dwelling Capacity Model.
3. I also worked between 2011 and 2012 for the Auckland Council on the Auckland Plan. I was involved in the overarching Development Strategy and in particular on the subject of housing supply.
4. I have since 2012 worked as a planning consultant with my current employer John Edmonds and Associates Ltd. I am involved in resource consents, in preparing and project managing plan changes and have been involved in a Council district plan review (including as a reporting planner).
5. In 2015 I was engaged by Millbrook Country Club Ltd to prepare, in collaboration with the Council, the proposed Millbrook Resort Zone for the District Plan. Along with drafting the provisions, I wrote the Section 32 report and coordinated work from various consultants. I also recently prepared a number of submissions on behalf of clients on the proposed Queenstown Lakes District Plan.

### **Code of Conduct Statement**

6. I have read the Code of Conduct for Expert Witnesses contained within the Environment Court Practice Note 2014, and (although this matter is not before the Environment Court) I have complied with it in the preparation of this evidence. This evidence is within my area of expertise and I confirm I have not omitted to consider material facts known to me that might alter or detract from the opinions I have expressed.

## **Scope of this Evidence Structure**

7. I have been asked to prepare evidence by Millbrook Country Club, Bridesdale Farm Developments Ltd and Winton Partners Fund Management No 2 Limited. While these clients have influenced the scope of matters I have addressed, I emphasise that my views are independent.
8. My evidence relates to Chapters 3 (Strategic Direction), 4 (Urban Development) and 6 (Landscape) of the Proposed District Plan.
9. The relevant reports I have read and considered in relation to this evidence include:
  - (a) Section 32 Evaluation Report - Strategic Directions
  - (b) Section 32 Evaluation Report - Urban development
  - (c) Section 32 Evaluation Report - Landscape, Rural Zone and Gibbston Character Zone
  - (d) Section 42a Hearing Report – Chapter 3 Strategic Direction, Chapter 4 Urban Development, and accompanying expert statements
  - (e) Section 42a Hearing Report – Chapter 6 Landscapes
10. To avoid confusion, I will refer in this evidence to the provisions as numbered in the Section 42a reports (unless otherwise stated) as opposed to the notified provisions.

## **Overall comments**

11. Messrs Paetz and Barr in their s42a reports have made several good recommendations which represent improvements to the wording. I will make some further wording recommendations and comments on how I believe the structure of the plan can be adjusted to make it better address the resource management issues of the District.
12. I welcome amendments that reduce the number of objectives and policies in the Plan. I considered that the draft Plan had a number of unnecessary objectives and policies (a substantial increase over the number of district wide objectives and policies addressing similar matters in the Operative District Plan). In my experience large numbers of objectives and policies crafted in a similar manner do no more than add to the time that needs to be spent on writing Assessments of Environmental Effects and Resource Consent decisions. Given the large number of consents that are processed in the District, such added time and cost results in an inefficiency which I believe should be reduced where possible.

## Landscape and Rural Objectives and Policies

13. I have some concerns about the practicality of several of the proposed objectives and policies with respect to rural areas and associated landscape and visual amenity values. The District has changed somewhat since the previous District Plan was settled and I think the Council is right to critically assess and amend some of the district wide objectives and policies on these matters. But I am not convinced the proposed plan has recommended an improved framework.
14. A key concern I have is how broadly the landscape objectives and policies apply. On this matter the proposed Plan is quite unclear. For example should they apply to zones such as the Millbrook Resort Zone? Rule 6.4.1.2 (as notified in the District Plan) was ambiguous in this respect.<sup>1</sup> The provisions proposed by Mr Barr are an improvement but I still do not consider them sufficiently certain. Mr Barr's proposed rule 6.4.1.2 states:

*The Landscape Chapter and Strategic Direction Chapter's objectives and policies are relevant and applicable in all zones where landscape values are at issue.*
15. To me this is too uncertain for a rule. In what zones exactly are landscape issues at issue? I consider that some restructuring can mean this rule can be deleted.
16. In the proposed District Plan (and the provisions recommended by Messrs Paetz and Barr) most landscape objectives and policies sit at a district-wide level. I consider this leads to too much generality in how they are applied.
17. I suggest there is an opportunity to create a plan much better tailored to the varying resource management issues across the District if many of the objectives and policies of the landscape chapter are applied at a zone level rather than a district-wide level. In the process, these district-wide chapters can be shortened.
18. I believe that the objectives and policies of the Strategic Directions chapter as proposed by Mr Paetz provide sufficient direction at a district-wide level on rural, landscape and visual amenity values. I recommend moving the other objectives and policies proposed in the Landscape Chapter to the various zones of the District Plan such as the Rural General Zone as they are applicable. As a result the Landscape Chapter could be deleted.
19. I think there is a sound rationale to this suggested structure. In terms of objectives and policies that sit at a district-wide level, those relating to Outstanding Natural Landscapes and Outstanding Natural Features do in

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<sup>1</sup> I acknowledge that the applicability of the landscape objectives and policies to some zones has also been a point lacking clarity in the Operative District Plan.

my opinion warrant being in the district-wide part of the Plan. They are of course matters of national importance (in terms of Section 6). Importantly they are not all contained within one zone (for example parts of the Jacks Point Zone are classified as ONL) and development in the foreground of an ONL or ONF (even if not located within that landscape or feature) can affect the values of that landscape or feature.

20. However, the values of the areas outside of ONLs are to me less clear cut and consistent across the district. Certainly some areas demonstrate amenity values in terms of Section 7(c). Other areas have been identified by the Court to not exhibit such characteristics (the Other Rural Landscapes).
21. And there are significant differences in terms of the function of these rural areas. Much if not most of the lowlands of the Wakatipu Basin are utilised for lifestyle or resort-type activities. This is acknowledged in the Operative and Proposed District Plans through a mosaic of different zones which serve different purposes and provide for development of varying nature and scale. If some submissions to the District Plan are accepted, there may be more such lifestyle or "special" zones in the Basin. In parts of the Upper Clutha productive farming still appears to predominate.
22. Furthermore, I accept the landscape evidence of Dr Read around the difficulty of applying the same Plan provisions to the quite different characters of the Upper Clutha and Wakatipu Basins.
23. The proposed Rural Landscape Classification" (RLC) extends across a range of different zonings, including within the Wakatipu Basin. Applying generic objectives and policies to such diverse rural areas as the Wakatipu Basin and Upper Clutha RLCs and the broad range of other rural living, resort and special zones is to me problematic. In my opinion, many of the district-wide objectives and policies appear to be crafted around the Rural General Zone as it operates in parts of the District.
24. It is my opinion that the objectives and policies of Chapter 6 do not suitably underpin many of the proposed zones in the RLC, let alone provide a reasonable foundation for the consideration of those proposed in submissions. Specifically, I consider that the Wakatipu Basin faces particular pressures, and has particular constraints and opportunities that could be better recognised. I shall elaborate by commenting on specific objectives and policies<sup>2</sup>.

#### 3.2.1.4.1 and 3.2.1.5

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<sup>2</sup> Unfortunately the formatting of the Section 42a reports is not always clear. I have attempted to quote the correct reference numbers but may have made errors on occasions.

25. I endorse Mr Paetz's recommended additions of objectives and policies which emphasise the social and economic benefits of tourism as I consider there is ample evidence (such as the economic report included in the Section 32 material for the Millbrook Zone) as to the importance such activities have to communities' wellbeing in the District. However, I believe that this objective and this policy do not align well with the objectives and policies under 3.2.5.5. (I return to this issue below at para 31).

#### 3.2.1.6

26. I support the intent of 3.2.1.6. But I am unclear what is meant in 3.2.1.6 by "strong productive value of farming", and I cannot find the evidential support in the S32 documentation to justify that statement. To avoid any misinterpretations, I believe the objective can be simplified to simply say "farming".

#### 3.2.5.1

27. I have read Mr Paetz's discussion on this objective and his argument as to why inserting the words "inappropriate" is unnecessary. The objective would be clearer in my opinion were that word added. My concern is that a reader could be left with the impression that no subdivision, use or development is appropriate. It appears that that is not Mr Paetz's intention, so adding the term "inappropriate" would in my opinion reduce the risk of misinterpretations and associated inefficiencies.

#### 3.2.5.2

28. I believe this policy as recommended by Mr Paetz is phrased in an appropriate tone and is a useful addition. I suggest however that if the panel accepts my suggestion that a more zone-by-zone approach to managing landscape values can be followed, this policy can be made to read more generally. I believe the reference to the Rural Landscape Classification can be removed from here and other parts of the Plan. See Appendix 1 to this evidence for my suggested wording.

#### 3.2.5.3.1

29. My concern with this policy is that "without detracting from" sets a very high bar. In the wider Queenstown area it is becoming difficult to find any new areas for urban development that do not at least have some adverse effects on landscape or visual amenity values. In terms of the broader application of Part II of the Act, and the need to balance various considerations, I believe that the sustainable management of the district will need to involve some flexibility in this respect.
30. I suggest in Appendix 1 that this objective can be moved to become a policy grouped with other issues on urban development. I suggest some

wording changes that make it clear some degree of diminution of landscape and visual amenity values can be acceptable in some circumstances.

3.2.5.5, 3.2.5.5.1 and 3.2.5.5.1

31. These objectives and policies raise some important issues about how the District Plan assists the Council in achieving the purpose of the Act. I have some concerns I wish to spell out.
32. Firstly, while I do not doubt the importance of farming as a suitable land use in much of the District, it would be unfortunate were these provisions used to stifle diversification to other uses. Diversification toward industries that can more readily serve the economic wellbeing of individuals and communities should in my opinion not be discouraged by the District Plan. In my opinion, whether intended or not, "giving preference" to farming activity could be used to that effect.
33. Secondly, it is to me a generalisation that agricultural land use is fundamental to landscape character. To repeat my earlier statements, it may be true for much of the District (and probably much of the Rural General Zone) but I am sceptical of this for much of the Wakatipu Basin where lifestyle development now predominates over economic farming models.
34. Policy 3.2.5.5.2 refers to evolving forms of land use which may change the landscape. In areas where productive farming predominates this may well be justifiable. But when applied more broadly, and when read in conjunction with the other objectives and policies in this section, I believe some perverse implications and interpretations can arise. Should we assume for example that "industrial scale" agriculture which may involve the likes of pivot irrigators (which at this point are not common in the District, except for a handful in the Hawea area) is fundamental to the character of our landscapes (as per the accompanying objective)? And therefore, should such outcomes be "given preference" over other land uses?
35. I use the Millbrook Zone as an example. I question whether farming is preferable from a landscape perspective in all parts of the District over "resort-style" development. I anticipate the panel will hear landscape evidence on this matter when it hears the Millbrook Zone. But even if the panel came to a view that such outcomes are preferable from a landscape perspective, in that context I do not consider that the purpose of the Act would be served by elevating this preference above other resource management issues (such as the economic benefits of resort development set out in the Section 32 report for the Millbrook Zone).

36. My recommendation is that these objectives and policies be deleted as I see them as unnecessary. They can be provided for (possibly in a modified form) via objectives and policies and the permitted activity status of farming in the Rural Zone, where the vast majority of farming occurs.

#### Chapter 6

37. In my opinion, the landscape and rural policies of Chapter 3 (with a few amendments as recommended) provide sufficient direction and guidance at a district-wide level. To me, Chapter 6 either duplicates the higher level matters covered in Chapter 3, delves into particular detail unnecessary at a district-wide level, or suffers from the generalised approach to the District which I consider inappropriate (as discussed above).
38. I believe Chapter 6 is best deleted. The work of the Council and Mr Barr would not be lost, but in the same manner that Mr Barr has recommended that the assessment matters of that chapter should be considered at the hearing for the Rural Zone, I believe the relevant objectives and policies can be drawn down to that level and considered at that point, and at the point other zones are considered. I believe that it is at a zone-by-zone level that a more useful discussion on the character and function of our rural areas can be had.
39. In my opinion this would result in a more clearly articulated plan whereby landscape objectives and policies are carefully tailored to each zone. This, I believe, would be a more effective and efficient Plan.

#### **Urban Growth Issues**

40. In general, I accept the broader arguments for urban growth management in the Queenstown Lakes District set out by Mr Paetz and other technical experts. Having spent much of my career working on issues of housing supply and rezonings for new urban areas, I have a few observations to add.
41. The dwelling capacity in the district is often reported on and referred to. I consider that while the Dwelling Capacity Model is a very useful tool, its results need to be treated with caution. As Mr Paetz acknowledged, much of the District's greenfield capacity (particularly in the Wakatipu area) is held in a few ownerships. Experience over many years shows that we cannot be certain these areas will be developed any time soon.
42. What in my opinion is needed is a responsive plan that can be amended quickly to increase zoned land supply if other zoned areas are not being developed. Such "responsiveness" is rather hard to achieve in planning, and the likes of the Productivity Commission<sup>3</sup> has raised concerns (drawing

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<sup>3</sup> New Zealand Productivity Commission – Housing Affordability Inquiry – Final report March 2012



on other research) as to the inelasticity of supply of land for housing in parts of New Zealand, and the contribution planning makes to this problem.

43. Having been involved in a number of plan changes in the District for new urban areas, I can attest to the fact that it is generally a slow and resource intensive process. Assessments on matters such as landscape and infrastructure effects are very thorough and there are extensive checks and balances and opportunities for public participation. Much of this is inherent in the system, and I am not necessarily suggesting that the Operative District Plan should have been significantly liberalised in terms of how it manages urban growth. But I do think that of all the resource management issues the District faces, a shortage of land supply for housing is amongst the most serious. I therefore recommend that the Panel ensure the Plan enables plenty of zoned land for housing and is also flexible (at least as much as the Operative Plan) to be adjusted to enable new opportunities for housing and other urban growth.
44. As noted by Mr Paetz, the ability of the Plan to adapt to enable Shotover Country to occur alleviated what otherwise may have been more serious housing supply constraints in the Wakatipu than are already the case. Recently, Bridesdale (via the Special Housing Area legislation) and Hanley Downs in the Wakatipu and Northlake in Wanaka are examples of plan changes and resource consents that can introduce more supply into the market. This adaptability is important to maintain into the future.
45. As set out in Mr Paetz's section 42a report, a key means in which Council is seeking to increase housing supply is through allowing greater intensification of existing urban areas. I endorse this in principle. But I am not certain as to the extent that this will significantly meet housing demand. In my experience, there are some reasons to be cautious:
  - (a) In smaller towns the locational advantages of more centralised redeveloped or "infill" sites over peripheral greenfield areas are generally not as great as in metropolitan areas. This may dampen demand for infill sites;
  - (b) Much of the District has quite young housing stock, and for many such landowners it may make little sense to redevelop or subdivide their sites;
  - (c) In many areas terrain, covenants and site constraints limit what can practically be developed;

- (d) Larger scale greenfield development offers economies of scale that may be able to make a greater contribution to supply in times of high demand<sup>4</sup>
46. The reports I have read suggest Council officers are aware of many of these issues, and it is not my intention to suggest that enabling more infill development is inappropriate. Rather, I think that the Council should monitor the extent to which newly created development opportunities contribute to housing supply, and that the panel ensure that the new Plan is sufficiently flexible to enable more greenfield development should uptake of infill opportunities be low.
47. This turns me to the question as to whether the Plan as notified provides the flexibility to enable new urban development in the manner I consider to be important. I believe that to some extent it does, but it can be simplified and improved.
48. Council has for many years now been introducing the method of Urban Growth Boundaries (first introduced to the Operative District Plan around Arrowtown). For all I have read about the method as it applies in this District, I have never been convinced as to the value urban growth boundaries add to the Queenstown Lakes District planning policy framework.
49. The growth boundaries proposed simply follow the extent of the zones that enable urban development in the District<sup>5</sup>. Mr Paetz makes the observation<sup>6</sup> that one can apply for plan changes to move the boundary or a resource consent to develop outside of the boundary anyway. I have therefore questioned what urban growth boundaries offer that is different from a zone boundary<sup>7</sup>.
50. By my assessment, it is correct that a plan change can be applied for to move an urban growth boundary in the proposed framework and it will be considered on its merits. I suspect that a resource consent for any urban development<sup>8</sup> would have a rather tougher path to get through the “gateway” of Section 104D (1)(b). This raises for me a question as to why it would be appropriate to discourage applications for urban development

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<sup>4</sup> As noted in the report New Zealand Productivity Commission – Housing Affordability Inquiry – Final report March 2012

<sup>5</sup> And at times encapsulate parts of the District which are not proposed nor would ever in my opinion be appropriate for urban development, such as the ONL areas of Jacks Point.

<sup>6</sup> See para 12.63 of the Urban Development Chapter

<sup>7</sup> This is quite different from lines drawn in a Regional Policy Statements such as a Metropolitan Urban Limit in the Auckland RPS. Due to the hierarchy of Plans set out in the Act these are less flexible and are not subject to private plan changes. They are therefore of more significant implication, but that is not the proposal being considered here.

<sup>8</sup> I note that I have concerns as referred to in the submission of Millbrook Country Club as to the clarity of the definition of urban development. While this matter is in my opinion very important, I understand definitions such as this are the subject of a future hearing.

via resource consent. I would find it informative if Mr Barr could elaborate on his statements as to why the plan change process is necessarily a more strategic approach than a resource consent, and why it is therefore preferred by Council<sup>9</sup>.

51. Resource consents to urbanise land can in my experience be a more efficient process, involving less resources and time and providing for a more precise consideration. Indeed, when one applies for a private plan change, an option available to Council is to process it instead as a resource consent. In Queenstown the Rural Residential and Rural General areas that surround Lake Hayes Estate were subdivided to urban densities via resource consent in the mid-2000s. While this approach wasn't perhaps the most "tidy" approach to urbanising land (and led to some subsequent inefficiencies such as a zoning that does not align well with the built environment) it helped provide housing supply in a manner that I believe was much quicker than if plan changes were pursued. That ability to respond quickly with new housing supply, I consider, is a more important resource management issue than the aforementioned inefficiencies around zoning being misaligned with a developed urban area. To me this is an example of a responsive and flexible planning regime, and why the plan should not strongly discourage resource consents which seek to urbanise land.
52. In summary, it is my opinion that the method of Urban Growth Boundaries offers little that a zone boundary does not provide. Its only effect is to (possibly) make resource consents for urban development more difficult to pursue, for which I am not persuaded there is a compelling justification.
53. I have contemplated how the urban development chapter may be improved. It is my opinion that this is one example of where the Operative District Plan was quite effective in that it had (at least before it was modified by later plan changes) some fairly succinct principles set out in Section 4 of the Operative District Plan that guided where and how development should occur. By contrast I consider Chapter 4 of the Proposed District Plan to be lengthy and excessively repetitive. It also raises some issues for which I have seen no evidence to justify being criteria for the consideration of urban extensions (I refer in particular to proposed Policy 4.2.1.7 which seeks to maintain the productive potential of the soil resource of rural land).
54. In the interests of a briefer plan I suggest that Urban Growth Boundaries can be removed and some of the key principles of managing urban growth can be moved from proposed Chapter 4 to Chapter 3. I have recommended that five policies (drawn from proposed Chapter 4 and from considering the policies in Chapter 4 of the Operative District Plan). I consider that these policies would be the most appropriate to achieve the proposed objective.

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<sup>9</sup> Refer para 9.70 or Mr Barr's report.

They would be far more succinct (and therefore efficient), and will provide sufficient strategic guidance (i.e. be effective) on the consideration of applications to urbanise land (via plan change or resource consent). I recommend that they be written in a manner which does not seek to preclude the possibility of resource consents to urbanise land being approved (hence why I prefer the verb "enable" rather than "direct" in my recommended 3.2.2.1.3). I make recommendations in Appendix 1 to this evidence.

## **Conclusion**

55. Overall, I believe that the amendments I suggest would provide for a more succinct overarching section of the District Plan. Three overarching chapters can be combined into one. I think this will be more user friendly and will result in a more effective and efficient plan. Issues with respect to the generalised approach to managing landscape, rural and visual amenity values can be addressed by ensuring that more matters are considered at a lower "zone level". And the plan can be simplified and made to be more responsive to demand for urban land by the removal of urban growth boundaries.
56. My suggested amendments can be seen in Appendix 1 to this evidence. For the avoidance of doubt, I recommend that both proposed Chapter 4 and 6 be deleted and that the attached version of Chapter 3 be the combined chapter to cover Landscape and Urban Growth issues at a District-wide level.

Daniel Wells

Dated: **29 February 2016**

# STRATEGIC DIRECTION 3

Key: Recommend changes to notified chapter are shown in underlined text for additions and ~~strike through text~~ for deletions. Dated 19 February 2016. Further changes recommended by Dan Wells shown in tracked changes and highlighted.

## 3 Strategic Direction

### 3.1 Purpose

This chapter sets out the over-arching strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the Queenstown Lakes District's special qualities:

- Dramatic alpine landscapes free of inappropriate development
- Clean air and pristine water
- Vibrant and compact town centres
- Compact and connected settlements that encourage public transport, biking and walking
- Diverse, resilient, inclusive and connected communities
- A district providing a variety of lifestyle choices
- An innovative and diversifying economy based around a strong visitor industry
- A unique and distinctive heritage
- Distinctive Ngai Tahu values, rights and interests

This direction is provided through a set of Strategic Goals, Objectives and Policies which provide the direction for the more detailed provisions related to zones and specific topics contained elsewhere in the District Plan.

### 3.2 Goals, Objectives and Policies

#### 3.2.1 Goal - Develop a prosperous, resilient and equitable economy.

**3.2.1.1 Objective** - Recognise, develop and sustain the Queenstown and Wanaka ~~central business areas~~ town centres as the hubs of New Zealand's premier alpine resorts and the District's economy.

#### Policies

- 3.2.1.1.1 Provide a planning framework for the Queenstown and Wanaka ~~central business areas~~ town centres that enables quality development and enhancement of the centres as the key commercial, civic and cultural hubs of the District, building on their existing functions and strengths.
- 3.2.1.1.2 Avoid commercial rezoning that could ~~fundamentally~~ undermine the role of the Queenstown and Wanaka ~~central business areas~~ town centres as the primary focus for the District's economic activity.
- 3.2.1.1.3 Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka ~~central business areas~~ town centres.

## STRATEGIC DIRECTION 3

**3.2.1.2** Objective – Recognise, develop, sustain and integrate the key mixed use function of the wider Frankton commercial area, comprising Remarkables Park, Queenstown Airport, and Five Mile.

### Policies

- 3.2.1.2.1 Provide a planning framework for the wider Frankton commercial area that facilitates the integrated development of the various mixed use development nodes.
- 3.2.1.2.2 Recognise and provide for the varying complementary functions and characteristics of the various mixed use development nodes within the Frankton commercial area.
- 3.2.1.2.3 Avoid additional commercial rezoning that will undermine the function and viability of the Frankton commercial area, or which will undermine increasing integration between the nodes in the area.

**3.2.1.3** **Objective -** Recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka ~~central business areas~~ town centres and Frankton.

### Policies

- 3.2.1.3.1 Avoid commercial rezoning that would ~~fundamentally~~ undermine the key local service and employment function role that the ~~larger urban~~ centres outside Queenstown, and Wanaka ~~central business areas~~ and Frankton fulfil.
- 3.2.1.3.2 Reinforce and support the role that township commercial precincts and local shopping centres fulfil in serving local needs.
- 3.2.1.3.3 Avoid non-industrial activities not related to or supporting industrial activities occurring within areas zoned for Industrial activities.

**3.2.1.4** **Objective –** Recognise and provide for the significant socioeconomic benefits of tourism activities across the District.

- 3.2.1.4.1 Enable the use and development of natural and physical resources for tourism activity where adverse effects are avoided, remedied or mitigated.

**3.2.1.5** **Objective -** Enable the development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.

### Policies

- 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.
- 3.2.1.5.2 Encourage economic activity to adapt to and recognise opportunities and risks associated with climate change and energy and fuel pressures.

**3.2.1.6** **Objective -** Recognise the potential for rural areas to diversify their land use beyond ~~the strong productive value of~~ farming, provided ~~a sensitive approach is taken to~~ adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated.

**3.2.1.7** **Objective -** Maintain and promote the efficient and effective operation, maintenance, development and upgrading of the District's infrastructure, including designated Airports, key roading and communication technology networks.

# STRATEGIC DIRECTION 3

## Policies

3.2.1.7.1 Safeguard the efficient and effective operation of regionally significant infrastructure from new incompatible activities.

## 3.2.2 Goal - The strategic and integrated management of urban growth

### 3.2.2.1 Objective - Ensure urban development occurs in a logical manner:

- to promote a compact, well designed and integrated urban form;
- to manage the cost of Council infrastructure; and
- to protect the District's rural landscapes from sporadic and sprawling development.

## Policies

### Policies

3.2.2.1.1 Encourage a higher density of residential development in locations that have convenient access to public transport routes, cycleways or are in close proximity to community and education facilities.

3.2.2.1.2 Development enhances connections to public recreation facilities, reserves, open space and active transport networks.

3.2.2.1.3 Enable new urban subdivision, use or development to occur in those areas which have potential to absorb change without significantly detracting from important and valued landscape and visual amenity values.

3.2.2.1.4 When considering proposals to extend urban areas, assess potential effects on infrastructure cost and efficiency.

3.2.2.1.5 Clearly demarcate the edges of urban areas through design solutions and avoid sprawling development along the roads of the district.

**Comment [d1]:** These policies are worded the same as policies recommended by Mr Paetz in his Chapter 4

**Comment [d2]:** This is the wording of an objective recommended by Mr Paetz below in his Chapter 3 that I believe can be moved to this location as a policy with amendments.

~~3.2.2.1.4 3.2.2.1.6 Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Jack's Point), Arrowtown and Wanaka.~~

~~3.2.2.1.2 3.2.2.1.7 Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs.~~

~~3.2.2.1.3 3.2.2.1.8 Manage the form of urban development within the UGBs ensuring:~~

- ~~• Connectivity and integration with existing urban development;~~
- ~~• Sustainable provision of Council infrastructure; and~~
- ~~• Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems~~

~~3.2.2.1.4 3.2.2.1.9 Encourage a higher density of residential development in locations close to town centres, local shopping zones, activity centres, public transport routes and non-vehicular trails.~~

## STRATEGIC DIRECTION 3

~~3.2.2.1.5 3.2.2.1.10~~ Ensure UGBs contain sufficient suitably zoned land to provide for future growth and a diversity of housing choice.

~~3.2.2.1.6 3.2.2.1.11~~ Ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships, to reduce the incentive for land banking in order to address housing supply and affordability.

~~3.2.2.1.7 3.2.2.1.12~~ That further urban development of the District's small rural settlements be located within and immediately adjoining those settlements.

**3.2.2.2 Objective** - Manage development in areas affected by natural hazards.

### Policies

3.2.2.2.1 Ensure a balanced approach between enabling higher density development within the District's scarce urban land resource and addressing the risks posed by natural hazards to life and property.

**3.2.3 Goal - A quality built environment taking into account the character of individual communities**

**3.2.3.1 Objective** - Achieve a built environment that ensures our urban areas are desirable and safe places to live, work and play.

### Policies

3.2.3.1.1 Ensure development responds to the character of its site, the street, open space and surrounding area, whilst acknowledging the necessity of increased densities and some change in character in certain locations.

3.2.3.1.2 That larger scale development is comprehensively designed with an integrated and sustainable approach to infrastructure, buildings, street, trail and open space design.

3.2.3.1.3 Promote energy and water efficiency opportunities, waste reduction and sustainable building and subdivision design.

**3.2.3.2 Objective** - Protect the District's cultural heritage values and ensure development is sympathetic to them.

### Policies

3.2.3.2.1 Identify heritage items and ensure they are protected from inappropriate development.

**3.2.4 Goal - The protection of our natural environment and ecosystems**

~~3.2.4.1 Objective~~ - ~~Promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.~~ Ensure development and activities maintain indigenous biodiversity, and sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.

**3.2.4.2 Objective** - Protect areas with significant Nature Conservation Values.

### Policies

3.2.4.2.1 Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure their protection.

~~3.2.4.2.2~~ ~~Where adverse effects on nature conservation values cannot be avoided, remedied or mitigated, consider environmental compensation as an alternative.~~



## STRATEGIC DIRECTION 3

**3.2.4.3 Objective** - Maintain or enhance the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities.

### Policies

3.2.4.3.1 That development does not adversely affect the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities

**3.2.4.4 Objective** - Avoid ~~the spread of wilding exotic vegetation with the potential to spread and naturalise.~~ to protect nature conservation values.

### Policies

3.2.4.4.1 ~~That Prohibit the planting of identified exotic vegetation with the potential to spread and naturalise is banned.~~

**3.2.4.5 Objective** - Preserve or enhance the natural character of the beds and margins of the District's lakes, rivers and wetlands.

### Policies

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.

**3.2.4.6 Objective** - Maintain or enhance the water quality and function of our lakes, rivers and wetlands.

### Policies

3.2.4.6.1 That subdivision and / or development be designed so as to avoid adverse effects on the water quality of lakes, rivers and wetlands in the District.

**3.2.4.7 Objective** - Facilitate public access to the natural environment.

### Policies

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.

**3.2.4.8 Objective** - Respond positively to Climate Change.

### Policies

3.2.4.8.1 Concentrate development within existing urban areas, promoting higher density development that is more energy efficient and supports public transport, to limit increases in greenhouse gas emissions in the District.

**3.2.5 Goal** - Our distinctive landscapes are protected from inappropriate development.

**3.2.5.1 Objective** - Protect the ~~natural character~~ quality of the Outstanding Natural Landscapes and Outstanding Natural Features from inappropriate subdivision, use and development.

### Policies

3.2.5.1.1 ~~Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of subdivision and development.~~

**3.2.5.2 Objective** - ~~Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.~~ Maintain and enhance the landscape character of the Rural

## STRATEGIC DIRECTION 3

~~Landscape Classification of important landscape values outside of Outstanding Natural Landscapes and Features, whilst acknowledging the potential for managed and low impact change.~~

### Policies

- 3.2.5.2.1 ~~Identify the district's Rural Landscape Classification on the district plan maps, and minimise the effects of subdivision, use and development on these landscapes.~~

~~3.2.5.3 Objective – Direct new urban subdivision, use or development to occur in those areas which have potential to absorb change without detracting from landscape and visual amenity values.~~

**Comment [d3]:** Objective moved and reworded as a policy

### Policies

- ~~3.2.5.3.1 3.2.5.2.2 Direct urban development to be within Urban Growth Boundaries (UGB's) where these apply, or within the existing rural townships.~~

~~3.2.5.4 3.2.5.3 Objective - Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscape are to be maintained.~~

### Policies

- ~~3.2.5.4.1 3.2.5.3.1 Give careful consideration to cumulative effects in terms of character and environmental impact when considering residential activity in rural areas.~~

- ~~3.2.5.4.2 3.2.5.3.2 Provide for rural living opportunities in appropriate locations.~~

~~3.2.5.5 Objective – Recognise that agricultural land use is fundamental to the character of our landscapes.~~

### Policies

- ~~3.2.5.5.1 Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.~~

- ~~3.2.5.5.2 Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.~~

**3.2.6 Goal - Enable a safe and healthy community that is strong, diverse and inclusive for all people.**

**3.2.6.1 Objective - Provide Enable access to housing that is more affordable.**

### Policies

- 3.2.6.1.1 Provide Enable opportunities for low and moderate income Households to live in the District in a range of accommodation appropriate for their needs.

- 3.2.6.1.2 In applying plan provisions, have regard to the extent to which minimum site size, density, height, building coverage and other controls influence Residential Activity affordability.

**3.2.6.2 Objective - Ensure a mix of housing opportunities.**

### Policies

- 3.2.6.2.1 Promote mixed densities of housing in new and existing urban communities.

## STRATEGIC DIRECTION 3

3.2.6.2.2 Enable high density housing adjacent or close to the larger commercial centres in the District.

3.2.6.2.3 Explore and encourage innovative approaches to design to ~~provide~~ help enable access to affordable housing.

**3.2.6.3 Objective** - Provide a high quality network of open spaces and community facilities.

### **Policies**

3.2.6.3.1 Ensure that open spaces and community facilities are accessible for all people.

3.2.6.3.2 That open spaces and community facilities are located and designed to be desirable, safe, accessible places.

**3.2.6.4 Objective** - Ensure planning and development maximises opportunities to create safe and healthy communities through subdivision and building design.

### **Policies**

3.2.6.4.1 Ensure Council-led and private design and development of public spaces and built development maximises public safety by adopting "Crime Prevention Through Environmental Design".

3.2.6.4.2 Ensure Council-led and private design and development of public spaces and built development maximises the opportunity for recreational and commuting walking and cycling.

**3.2.7 Goal** - Council will act in accordance with the principles of the Treaty of Waitangi and in partnership with Ngai Tahu.

**3.2.7.1 Objective** – Recognise and provide for ~~Protect~~ Ngai Tahu values, rights and interests, including taonga species and habitats, and wahi tupuna.

**3.2.7.2 Objective** – Enable the expression of kaitiakitanga by providing for meaningful collaboration with Ngai Tahu in resource management decision making and implementation.