

**BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL**

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER OF

Queenstown Lakes Proposed District Plan – Upper Clutha  
Mapping

**STATEMENT OF EVIDENCE OF SCOTT SNEDDON EDGAR**

**ON BEHALF OF THE FOLLOWING SUBMITTER:**

**THE ALPINE GROUP (SUBMISSION #315 & FURTHER SUBMISSION #1309)**

**4<sup>TH</sup> April 2017**



**SOUTHERN LAND**

SURVEYING | PLANNING | LAND DEVELOPMENT

## **Introduction**

- 1 My name is Scott Sneddon Edgar. I am a Resource Management Planner and hold a Bachelor of Arts Degree (Honours) in Town and Country Planning from Strathclyde University in Glasgow, Scotland. I am an Associate Member of the New Zealand Planning Institute.
- 2 I have been employed by Southern Land Limited, a Wanaka based survey and planning consultancy, since October 2006. During my time at Southern Land I have been involved principally with the preparation of resource consent applications and the presentation of planning evidence at Council hearings.
- 3 Prior to relocating to New Zealand in 2005 I worked as a development control planner with various Scottish local authorities in both rural and urban regions.
- 4 Upon my arrival in New Zealand I was employed as a resource consents planner in the Wanaka office of Civic Corporation Limited before taking my current position with Southern Land Limited. I have a total of 17 years' planning experience, 11 of which have been gained in New Zealand.
- 5 I confirm that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court of New Zealand Practice Note 2014 and I agree to comply with it. In that regard I confirm that this evidence is written within my expertise, except where I state that I am relying on the evidence of another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

## **Scope of Evidence**

- 6 I have been engaged by The Alpine Group (submitter 315 and further submitter 1209) to provide expert planning evidence in relation to their submission supporting the creation of the Rural Industrial Sub Zone at Luggate and their further submission opposing the submission of Wakatipu Holdings (submitter 314).
- 7 I have read the relevant Section 42A Reports, the associated Section 32 Evaluation Reports and Council's expert evidence relating to landscape, transport and infrastructure as they relate to the submissions of The Alpine Group and Wakatipu Holdings.
- 8 The submission and further submission of The Alpine Group seek the following:

- That the Rural Industrial Sub Zone and all related provisions are made operative as proposed; and
- That the submission of Wakatipu Holdings is rejected.

9 My brief of evidence is set out as follows:

- Statutory Framework
- The Rural Industrial Sub Zone
- The Submission of Wakatipu Holdings
- Part 2 Assessment
- Conclusion

### **Statutory Framework**

#### The Resource Management Act 1991 (RMA)(the Act)

- 10 The RMA requires Council's to promote the sustainable management of natural and physical resources through the management of use, development and protection of natural and physical resources to provide for the social, economic and cultural well-being and health and safety of people, communities and future generations.
- 11 While there are no matters of national importance (*s6*) relevant to the consideration of these submissions the following other matters, as set out under section 7 of the Act, are of relevance:
- (c) *the maintenance and enhancement of amenity values;*
- (f) *the maintenance and enhancement of the quality of the environment;*
- 12 Section 79 of the Act directs that a district plan must be reviewed in the manner set out in Part 1 of Schedule 1 of the Act. In making changes to a district plan the local authority is required to:
- “*give effect to*” any national policy statement;
  - “*give effect to*” any regional policy statement;

- “must not be inconsistent with” a regional plan;
- “have regard to” any proposed regional policy statement.

Operative Regional Policy Statement for Otago (ORPS)

13 The Objectives and Policies of the ORPS that are of particular relevance to the consideration of these submissions are as follows:

**5.4      *Objectives***

5.4.1 *To promote the sustainable management of Otago’s land resource in order:*

- (a) *To maintain and enhance the primary productive capacity and life-supporting capacity of land resources; and*
- (b) *To meet the present and reasonably foreseeable needs of Otago’s people and communities.*

***Policies***

5.5.4 *To promote the diversification and use of Otago’s land resource to achieve sustainable landuse and management systems for future generations.*

Proposed Regional Policy Statement (PRPS)

14 The PRPS was notified on 23 May 2015 with decisions on submissions being released on 1st October 2016. The objectives and policies of the PRPS that are of particular relevance are as follows:

***Objective 4.5    Urban growth and development is well designed, reflects local character and integrates effectively with adjoining urban and rural environments***

***Policy 4.5.1     Managing for urban growth and development***

*Manage urban growth and development in a strategic and co-ordinated way, by all of the following:*

- a) *Ensuring there is sufficient residential, commercial and industrial land capacity, to cater for the demand for such land, over at least the next 20 years;*

- b) *Coordinating urban growth and development and the extension of urban areas with relevant infrastructure development programmes, to provide infrastructure in an efficient and effective way;*
- c) *Identifying future growth areas and managing the subdivision, use and development of rural land outside these areas to achieve all of the following:*
  - i. *Minimise adverse effects on rural activities and significant soils;*

***Objective 5.3 Sufficient land is managed and protected for economic production***

***Policy 5.3.1 Rural activities***

*Manage activities in rural areas, to support the region's economy and communities, by all of the following:*

- a) *Enabling primary production and other rural activities that support the rural economy;*
- b) *Minimising the loss of significant soils;*
- c) *Restricting the establishment of activities in rural areas that may lead to reverse sensitivity effects;*

**Higher Order Proposed District Plan Provisions**

- 15 The following objective of the Strategic Direction Chapter of the Proposed District Plan are of relevance to the consideration of the submissions:

***Goal 1 – Develop a prosperous, resilient and equitable economy.***

***Objective 3.2.1.4***

*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 rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.*

- 16 I agree with and support the higher order provisions of the PDP and consider that they appropriately give effect to the ORPS and have appropriate regard to the PRPS and achieve the purpose of the Act.

### **The Rural Industrial Sub Zone**

17 Having reviewed the associated s32 Evaluation Report and considered the provisions of the Rural Chapter of the Proposed District Plan, along with the higher order provisions, I consider that the establishment of the Rural Industrial Sub-Zone (including the zoning shown on the Proposed District Plan Maps for Luggate) appropriately achieves the objectives of the Proposed District Plan, particularly those related to the support and enablement of rural activities and the encouragement of rural diversification.

### **The Submission of Wakatipu Holdings**

18 The submission of Wakatipu Holdings generally relates to the land immediately adjacent to the proposed Rural Industrial Sub Zone at Luggate (the Wakatipu Holdings site)(the site) and seeks the following amendments to the Proposed Planning Maps:

- That Designation 429 – Luggate Closed Landfill is removed from the site or amended to accurately reflect the extent of the landfill; and
- That the proposed Rural and Hydro Generation Zoning is removed from the site; and
- That the site is zoned Rural Lifestyle.

19 The proposed rezoning of the Wakatipu Holdings site as Rural Lifestyle is of particular concern to The Alpine Group due to the likely reverse sensitivity effects that will result.

20 The proposed Rural Industrial Sub Zone includes established industrial activities that are based on rural resources and support farming and rural productive activities. The Proposed District Plan acknowledges the contribution farming makes to the management of the District's landscapes and seeks to provide for and enable rural activities generally.

21 While the objectives and policies of the Rural Residential and Rural Lifestyle Chapter acknowledge the effects that permitted and established rural activities will have on rural amenity the noise limited set out in Chapter 36 of the Proposed District Plan would apply to activities within the Rural Industrial Sub-Zone and as such the location of rural lifestyle development immediately adjacent to the Rural Industrial Sub-Zone will significantly compromise the rural industrial activities provided for within the sub-zone.

22 I therefore consider that the relief sought in the submission of Wakatipu Holdings, and in particular the proposed rezoning of the land immediately adjacent to the Rural Industrial Sub-

Zone as Rural Lifestyle, would not achieve the objectives of the Proposed District Plan and would not give effect to, or have appropriate regard to, the provisions of the ORPS and PRPS.

- 23 Consequently I agree with Mr. Barr in his opinion that<sup>1</sup>:

*"rezoning the subject site to Rural Lifestyle Zone would disrupt the rural character and would be incompatible with the established and zoned Rural Industrial Subzone activities to the east."*

## **Part 2 Assessment**

- 24 I consider that the relief sought in the submission of Wakatipu Holdings does not represent the most appropriate means of achieving the objectives of the Proposed District Plan and consequently I consider that the purpose of the Act, taking into account the relevant other matters set out in Section 7, could be more effectively met through the retention of the Proposed District Plan provisions as notified.

## **Conclusion**

- 40 For the reasons set out above I agree with Mr. Barr and consider that the submission of Wakatipu Holdings should be rejected.
- 41 In addition I consider that the Rural Industrial Sub Zone should be made operative as proposed.



Scott Sneddon Edgar

4<sup>th</sup> April 2017

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<sup>1</sup> Para. 20.17