

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER

of the Resource Management Act 1991

AND

IN THE MATTER OF

Plan Change 46 (Rural Land Rezoning) to
the Queenstown Lakes District Plan

STATEMENT OF EVIDENCE OF IAN CHRISTOPHER GREAVES

Introduction

- 1 My name is Ian Christopher Greaves. I hold the qualification of Bachelor of Applied Science (Environmental Management (Hons)) from the University of Otago. I am a full member of the New Zealand Planning Institute.
- 2 I hold the position of Resource Management Consultant at Southern Planning Group. I have over eight years' experience as a planner in roles with, Southern Planning Group, Queenstown Lakes District Council, the Environment Agency (UK) and Opus International Consultants (NZ). This experience includes over five years based as a planner in Wanaka.
- 3 Throughout my professional career, I have been involved in a range of resource consent and policy matters. I have made numerous appearances in front of hearing panels and I have also given evidence in the Environment Court.
- 4 I have read the Code of Conduct for Expert Witnesses outlined in the Environment Court's Consolidated Practice Note and have complied with it in preparing this evidence. I have read the Plan Change application and the Section 42A report. I confirm that the matters addressed in this brief of evidence are within my area of expertise and that I have not omitted to consider material facts known to me that might alter or detract from my opinions.

Scope of Evidence

- 5 I have been engaged by Ian Percy and Fiona Aitken to provide resource management planning evidence in relation to the matters raised in their submission on Plan Change 46 (submission referenced 46/5).
- 6 The key concerns of Ian Percy and Fiona Aitken relate to the effect the development might have upon their land and their vineyard operation. I have limited my evidence to address those matters. My evidence will address the following:
 - a) Background
 - b) District Plan Review

- c) Wanaka Structure Plan
- d) Demand for Industrial and Residential Land
- e) Amenity Effects
- f) Reverse Sensitivity Effects
- g) Statutory Framework
- h) Summary

Background

- 7 Ian Percy and Fiona Aitken are the registered proprietors of 246 Riverbank Road, Wanaka (Lot 8 Deposited Plan 300773). The site is 5.4141 hectares in area and contains a residential dwelling and established vineyard. The evidence of Mr Percy gives a detailed description of their land and its use.
- 8 246 Riverbank Road is zoned Rural General under the Queenstown Lakes District Plan. The District Plan defines the purpose of this zone as follows:

The purpose of the Rural General Zone is to manage activities so they can be carried out in a way that:

- *protects and enhances nature conservation and landscape values;*
- *sustains the life supporting capacity of the soil and vegetation;*
- *maintains acceptable living and working conditions and amenity for residents of and visitors to the Zone; and*
- *ensures a wide range of outdoor recreational opportunities remain viable within the Zone.*
- *protects the on-going operations of Wanaka Airport.*

The zone is characterised by farming activities and a diversification to activities such as horticulture and viticulture. The zone includes the majority of rural lands including alpine areas and national parks.

- 9 The land subject to Plan Change 46 adjoins the north western boundary of 246 Riverbank Road. The Plan Change 46 land is currently zoned Rural General under the Queenstown Lakes District Plan.

- 10 The existing dwelling within 246 Riverbank Road was approved under resource consent RM010927. Resource consent RM100294 approved the establishment and operation of frost fan at 246 Riverbank Road. RM010927 and RM100294 are attached as **Appendix 1 and 2** of this evidence. The operation of the frost fan is bound by conditions 1 – 16 of RM100294. This includes conditions limiting the type of frost fan, its use limited to protecting viticulture crops from frost during the critical periods of bud burst and prior to harvest and a maximum engine speed, operating temperature and operating wind speed. The conditions are designed to reduce potential noise effects on neighbouring properties. The use of the frost fan has been described in Mr Percy's evidence.
- 11 In my previous role as a planner at Queenstown Lakes District Council I was the reporting planner for RM100294. Initially I had concerns with the potential noise effects on neighbours as a result of this proposal and this resulted in a recommendation for decline within the Section 42a report I prepared. However, following the evidence at the hearing these concerns were alleviated subject to mitigating controls. I also note that my initial concerns on this resource consent application are consistent with my current opinion that the frost fan will create noise effects and these noise effects need to be carefully considered in terms of the effects from this Plan Change and in particular the interface between the proposed residential zone and 246 Riverbank Road, Wanaka.

The District Plan Review

- 12 The District Plan is currently under review. A key consideration therefore arises on whether the future use of the Plan Change 46 land is best left to be considered as part of this review process rather than the assessment of this plan change in isolation. It is my view that the District Plan review process would give a better opportunity to look holistically at the residential and industrial growth demands for Wanaka and address these needs on a District wide scale.

Wanaka Structure Plan

- 13 The purpose of the Wanaka Structure Plan is to provide a tool for the Council to manage growth in Wanaka over the next 20 years. The structure plan is a policy document formulated to be consistent with the Local Government Act 2002. The

result of the structure plan is a map of Wanaka identifying future zoning. The Plan Change 46 site is located entirely within the inner urban growth boundary on the Wanaka Structure Plan.

- 14 It is my opinion that the Wanaka Structure Plan should not be relied upon exclusively in the determination of this Plan Change, primarily because it is not a binding statutory document. The legal process that will test rezoning proposals is the one prescribed under the Resource Management Act 1991. Notwithstanding this, I do accept it should be given some consideration as I believe it to be an important guide for identifying the future issues for Wanaka and the appropriate locations for growth, retention of productive land, open space and community infrastructure, at least as suggested by the Wanaka community in 2007.

Demand for Industrial and Residential Land

- 15 A question that I do not think has been sufficiently addressed by the Plan Change Requestor is how much new residential and industrial land can be enabled within the Requestor's land while still promoting sustainable management?

- 16 The oversupply of land for residential and industrial purposes can lead to fragmented communities, inefficient infrastructure networks, duplication of residential amenities such as reserves and open space networks, reliance on cars versus more sustainable transport modes and the inefficient use of existing residential and industrial land.

- 17 The Section 32 Report (paragraph 2.1.1) identifies three resource management issues that Plan Change 46 seeks to address. Two of these issues are:

The Ballantyne Road industrial area is a focal point for industrial activity in Wanaka. A sufficient supply of land needs to be provided to meet the demands of industrial activities at this location (my emphasis).

The surrounding land is identified for future residential activity in the Wanaka Structure Plan. This needs to be implemented into the District Plan (my emphasis).

- 18 The supply of land within the Industrial B Zone was addressed as part of Plan Change 36. The Council's Senior Policy Analyst's report that addressed Plan Change 36 and the ORHL submission to include an additional 4.49 hectares of ORHL land within the Industrial B Zone made the following statement:

"If the ORHL land were also re-zoned as per the submission then a further 4.49 hectares of land would be re-zoned to Industrial B, which would provide for a further 9 years growth, bringing [sic] that the total supply would cater for around 40 years of demand. In my view, this extent of oversupply does not represent an efficient use of land/resources and is therefore not sensible planning".

- 19 Based on this evidence the need for the proposed industrial land as stated within the Plan Change Requestor's Section 32 report appears to be overstated. It is my view that this matter requires further analysis prior to determining the need and / or extent of any new industrial land within Wanaka. As a means of ensuring that the proposed Industrial B Zone is developed in an orderly and logical manner the Section 42a report recommends that the Industrial B extension proposed should be subject to a staging mechanism. I support this recommendation as a simple method of staging development based on the uptake of existing zoning, however I would like to see some analysis on the potential uptake of the proposed zone based on the availability of existing industrial land before the extent of any new industrial land is determined.

- 20 In terms of the supply of residential land, paragraph 5.2.3 of the Plan Change Requestor's Section 32 Report acknowledges that there is a sufficient supply of residential sections with the following statement:

"In regard to residential zoned land, while there is a good supply of residential zoned land in Wanaka, it is considered there is no real disadvantage to further rezoning. A plentiful supply of residential land will mean that there is availability of a range of sections, in a range of locations at affordable prices to suit the needs of all sectors of the community".

- 21 As outlined in paragraph 16 of this evidence I consider that the oversupply of development land can lead to adverse urban outcomes. Whilst I accept that the proposed residential zoned subject to this plan change in addition to the Gordon land to the north represents a logical expansion of urban Wanaka for future

growth, I do think consideration should be given to deferring the zoning until there is more need for this land supply. I am not convinced that the significant inefficiencies (in terms of infrastructure and services) referred to within the Section 42a report will occur if the proposed Low Density Residential zone is deferred.

Amenity Effects

- 22 The proposed Plan Change has the potential to result in adverse amenity effects on neighbouring rural properties. I do not believe this issue has been adequately addressed by the Plan Change Requestor and further attention to the interface between the proposed zoning and the Rural General sites to the south east is required.
- 23 The proposed residential zoning will provide for a residential density under the current District Plan rules of one dwelling per 450m². A number of residential sections will line the south-east boundary of the Plan Change 46 land. Under the District Plan dwellings up to 7m in height would be permitted up to 2m from the south-east boundary. This scenario could create a range of amenity effects on the Rural General sites to the south east from the loss of privacy, building dominance, lighting and noise. All of these effects will be exacerbated due to the higher elevation of the Plan Change 46 land. In my opinion the proposal as it currently stands creates a 'hard' edge of residential zoning with no transition into the rural environment. I believe it is prudent that the interface between the proposed residential zoning and the Rural General land is 'softened'. Existing pine trees along the north-west boundary of 246 Riverbank Road do assist in achieving this although it must be borne in mind that these trees are not under the Requestor's control and could be removed. They cannot be relied on as sole mitigation. I believe a combination of these trees and extending the proposed open green space along the south eastern extent of the proposed residential zoning is necessary to soften the interface and reduce potential amenity effects. I support the Section 42a report's recommendation for a landscaping buffer to achieve this. I think the planning provisions recommended in the Section 42a report to achieve this outcome, including the recommended structure plan are robust with one minor addition. With respect to recommended Rule 15.2.3.3 I consider that in order to achieve an effective landscape screening height for

plants and mounding the following bullet point is added to 15.2.3.3(ix)(e) of this rule:

- 'a combination of the naturalistic mounding and evergreen planting shall achieve a minimum screening height of 8m when plants are mature'

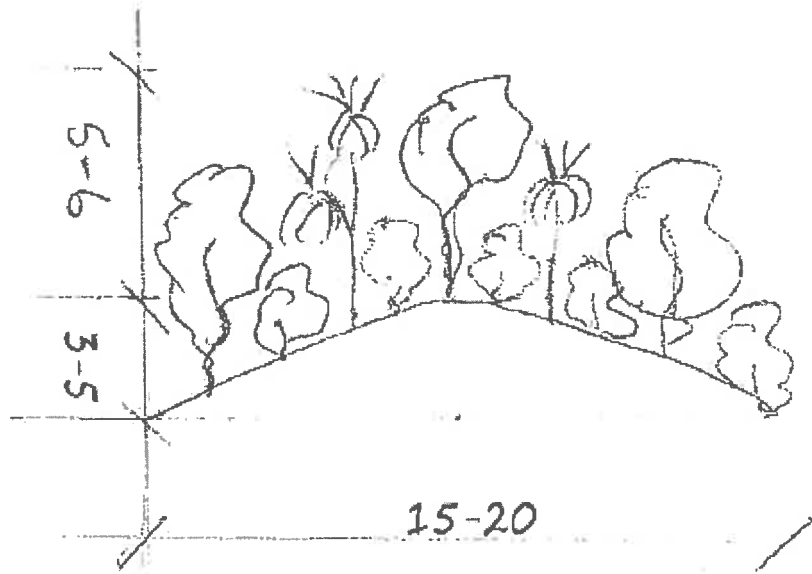
24 Whilst I am broadly satisfied that the Industrial B planning provisions are sufficient to manage potential amenity effects associated with industrial activities on neighbouring residents, I think it is important to recognise that those sites closest to neighbouring zones are unlikely to be able to cater for all types of industrial activities. There will be instances where some industrial activities could not establish along the boundaries of the zone without infringing the District Plan noise rules. This will require careful consideration at land use consent stage.

25 Aside from the proposed buildings and associated activities, the other primary factor that will create amenity effects onto the Rural General land to the south east is the proposed road through the open space area (Road 3). This road access will not only serve the land contained within Plan Change 46, but it may very well serve as a feeder road to further residential development within the Gordon land to the north-west (a submission point). As such, a significantly larger volume of traffic could use this access road in the future when compared to the present traffic volumes being assessed as part of Plan Change 46. This road will result in traffic noise and glare from both vehicles and street lights that will affect the amenity values of the Rural General land to the south east. The Section 42a report concludes that these effects will be appropriately mitigated with the existing Industrial B Zone provisions and it would be a poor design response removing Road 3 and mixing residential and industrial traffic. Whilst I agree that mixing residential and industrial traffic is an undesirable outcome and in this regard support the recommendation removing the linkage between Road 2 and Road 3, I think it is important to recognise the wider roading context in this case. If Road 3 remains all residents heading in the direction of Wanaka will pass along Ballantyne Road. This road is the hub of Industrial Wanaka and includes Industrial A and Ballantnye Road Mixed Use zones (yard based industrial and service activities). I am therefore less convinced that removing Road 3 and relocating the connection of the Plan Change land onto Ballantyne Road to the north via the existing industrial zone is a poor design response in this context. All

this would do is relocate traffic along a different path through the industrial zone whilst avoiding potential amenity effects on neighbouring properties.

- 26 In my view if Road 3 is to remain then I believe further attention is required in terms of the landscape outcomes required within the open green space buffer and the location of the road. The provisions of the District Plan that specify the requirements of planting and mounding within the open green space area are specified in Assessment Matter 11.6.2 (ii)(x)(e). The requirement for dense planting and mounding shown in the following diagram is restricted to the Connell Terrace western buffer. I think this is important because the buffer area between the industrial zone and Riverbank Road properties could have considerably less planting / mounding than the diagram depicted in this assessment matter. This is highlighted in the recent Outline Plan approved by QLDC for ORHL's existing Industrial B zone. A large storm water detention pond is proposed within the open green space. The approved Outline Plan decision is attached as **Appendix 3** of this evidence. The presence of this detention pond will limit the ability to establish planting or mounding between Road 3 and the land to the south east. I believe the planting and mounding requirements of Assessment Matter 11.6.2 (ii)(x)(e) should be extended to the open green space area associated with ORHL land. This would require the detention basin to be relocated. This will also help mitigate any amenity effects associated with industrial activities. With respect to Assessment 11.6.2 (ii)(x)(e) I recommend the following amendment.

'In respect of the western buffer shown on the Connell Terrace Precinct Structure Plan and the open green space south and west of Enterprise Drive, the Council expects the mounding and planting to provide effective mitigation in respect of noise attenuation and visual amenity. To achieve this the Council expects either a combination of naturalistic mounding of 3-5 metres in height and 15-20m in width, and predominantly evergreen planting of around 5-6 metres in height or, in the absence of any mounding, a 30 metre strip of dense predominantly evergreen planting of at least 8 metres in height is required in order to provide effective mitigation'.



- 27 The location of Road 3 is not fixed and the proposed Structure Plan allows this road's position to move by up to 10m. This flexibility could push this road very close to the southern boundary of the Plan Change land, exacerbating potential amenity effects. In my view this would be an inappropriate outcome. I recommend the position of the road is fixed on the proposed structure plan with a minimum 20m setback from the south eastern boundary.

Reverse Sensitivity Effects

- 28 Reverse sensitivity effects describes the impacts of an established activity on a new land use. Such effects can make an existing activity vulnerable to complaints from the new land use which can often force the established activity to restrict its operations so as to not adversely affect the new land use. In this case the use of the frost fan at 246 Riverbank Road has the potential to impact upon amenity values within the proposed residential zoning. Attached as **Appendix 4** to this evidence is the noise assessment report and noise evidence submitted in support of the frost fan resource consent application, RM100294. This evidence indicates that when operating the proposed frost fan will be audible at a level of 55dba and below within the proposed residential zone. The 55dba noise contour is located approximately on the boundary between the land subject to this Plan Change and 246 Riverbank Road and reduces the further you move away from the frost fan.

29 At paragraph 5.5 of the Section 32 report reverse sensitivity effects are addressed. The Section 32 report records that sleep disturbance from the proposed frost fan within the proposed residential zone is unlikely to occur given the sound insulating qualities of new residential dwellings. Based on the Marshall Day Acoustic report I accept with the correct mitigating measures in place this is correct. However, I do agree with the Section 42a report that the window between the noise levels received within the proposed Low Density Residential Zone and the outdoor noise limit for sleep disturbance is narrow. Given this narrow window I believe this further supports the case to reduce the 'hard' edge of residential zoning with a softer transition into the rural environment.

30 Conflict between residential development and agricultural land uses is not a unique planning issue. Complaints about noise and odour from agricultural land uses is an issue faced by many towns and cities throughout the world. By removing residential dwellings from the boundary with 246 Riverbank Road any reverse sensitivity effects will be reduced. The size of the setback distance is important, the further dwellings are positioned from the front fan the lower the noise impact will be. I do accept there needs to be a balance between setting residential development back from the frost fan whilst still providing a sustainable level of land available for residential development. In my view this balance lies at 50m. This will reduce the noise received at future dwellings whilst still providing ample Low Density Residential land. It is therefore my recommendation that the open green space is extended along the south eastern extent of the proposed residential zoning by a width of 50m.

Statutory Framework

31 In this section I discuss the statutory framework as it relates to Ian Percy's and Fiona Aitken's submission and I do not digress into a wider statutory assessment of the Plan Change as a whole.

32 Section 73 of the Act provides for changes to a District Plan in a manner set out in schedule 1. A District Plan must 'give effect to' any national policy statement and any regional policy statement and 'must not be inconsistent with' a regional plan.

Regional Policy Statement

33 The Otago Regional Policy Statement (RPS) provides an overview of the resource management issues facing Otago at a regional level, and sets policies and methods to manage Otago's natural and physical resources. The Otago Regional Policy Statement became operative on 1 October 1998.

34 Paragraphs 6.3.1 – 6.3.5 of the Plan Change Requestor's Section 32 report accurately sets out the relevant provisions as it relates to this Plan Change.

35 Objective 9.4.1 of the Regional Policy Statement (RPS) is particularly relevant to this Plan Change. Objective 9.4.1 states:

“9.4.1 To promote the sustainable management of Otago's built environment in order to:

(a) Meet the present and reasonably foreseeable needs of Otago's people and communities; and

(b) Provide for amenity values, and

(c) Conserve and enhance environmental and landscape quality; and

(d) Recognise and protect heritage values.”

36 Paragraph 6.3.5 of the Plan Change Requestors Section 32 report identifies that the proposed plan change will contribute to a high amenity urban environment where residential land is adequately separated from industrial land. I accept this to be correct. However, as outlined earlier, the high amenity urban environment could be compromised by the viticulture use of 246 Riverbank Road, in particular noise effects from the operation of the existing frost fan. I also consider that this Plan Change has the potential to result in adverse amenity effects on neighbouring rural properties, in particular noise, glare, dominance and loss of privacy. In my view further mitigation as outlined in this evidence is required for the Plan Change to align with the intent of Objective 9.4.1 of the RPS.

Proposed Regional Policy Statement

37 In changing a district plan, the territorial authority shall also 'have regard to' any proposed regional policy statement. The Otago Regional Council notified a

review to the Otago Regional Policy Statement in May 2015 and submissions closed on 24 July 2015. Of particular relevance is Objective 3.8 which states:

Objective 3.8

Urban growth is well designed and integrates effectively with adjoining urban and rural environments

38 Policy 3.8.1 promotes managing urban growth and the creation of new urban land in a strategic and co-ordinated way. This policy focuses on planning for future urban growth in appropriate locations. Policy 3.8.2 encourages the controlled release of land for new development that ensures a logical spatial development, and efficient use of existing land and infrastructure before new land is released. In my view this is a matter that has not been adequately addressed by the Plan Change Requestor. The potential effects as a result of poorly planned urban development are described in paragraph 16 of this evidence.

39 Policy 3.8.3 promotes the use and development of rural land in a manner that avoids effects from the loss of highly productive rural land and reverse sensitivity effects on rural productive activities. Reverse sensitivity noise effects from the existing frost fan at 246 Riverbank Road are a potential outcome as a result of this Plan Change as addressed earlier in this evidence. Policy 3.8.3 of the proposed RPS requires the 'avoidance' of such effects. In my opinion to successfully avoid this effect residential development should be set back beyond the south eastern boundary of the land subject to this plan change.

40 Overall, in my opinion the Plan Change application as it currently stands does not align with the relevant objectives and policies of the RPS and proposed RPS. This conclusion would be different if the recommended changes outlined within this evidence were adopted.

Queenstown Lakes District Plan

41 The Queenstown Lakes District Plan became fully operative on 10 December 2009. Section 4 of the Queenstown Lakes District Plan contains higher order objectives and policies that apply to all zones in the District. Section 5 of District Plan contains the relevant objectives and policies that apply to the Rural General

zone. Section 7 of District Plan contains the relevant objectives and policies that apply to the residential zones. Section 11 of the District Plan contains the relevant objectives and policies that apply to Business and Industrial Zones. I believe all four sections of the District Plan are of relevance to this Plan Change. I have addressed those that I consider relevant within the following tables:

Part 4 District Wide:

Objectives and Policies	Commentary (✓ = aligns × = does not align)
<p>Objective 4.2.5 and associated policies seeks subdivision, use and development to be undertaken in a manner which avoids, remedies or mitigates adverse effects on landscape and visual amenity values.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Future development (Policy 1) • Development within Visual Amenity Landscape (Policy 4) • Urban development (Policy 6) • Urban edges (Policy 7) • Cumulative degradation (Policy 8) 	✓
<p>4.9.3 (Urban growth) - Objective 1 - Natural Environment and Landscape Values</p> <p>Growth and development consistent with the maintenance of the quality of the natural environment and landscape values.</p>	✓

<p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Landscape qualities (Policy 1.1) 	
<p>4.9.3 - Objective 2 - Existing Urban Areas and Communities</p> <p>Urban growth which has regard for the built character and amenity values of the existing urban areas and enables people and communities to provide for their social, cultural and economic wellbeing.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • New growth protects and enhances built character and amenity values of existing residential areas (Policy 2.1) 	✓
<p>4.9.3 - Objective 3 - Residential Growth - Provision for residential growth sufficient to meet the District's needs.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Urban consolidation to occur where appropriate (Policy 3.1) • Encourage high density living that align with urban design principles and integration with different activities (Policy 3.2) • Low Density living that maintains and enhances existing residential character (Policy 3.3). 	<p>×</p> <p>The existing residential zones in Wanaka do provide 'sufficient' land to cater for future residential growth. Given the Plan Change will have the effect of providing an oversupply of land zoned for residential growth beyond what is sufficient for the District's needs I conclude the Plan Change is contrary to these provisions. I do think consideration should be given to deferring the zoning until there is more need for this land supply which would assist in aligning the Plan Change with these provisions.</p>

<p>4.9.3 - Objective 7 - Sustainable Management of Development</p> <p>The scale and distribution of urban development is effectively managed.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Urban development to be maintained in a way and at a rate that meets the identified needs of the community (Policy 7.1) • Concentrate urban development in Queenstown and Wanaka urban centres (Policy 7.2) • Establish urban growth boundaries (Policy 7.3) • To include land in an urban growth boundary for existing and future urban development (Policy 7.4) • To ensure that any rural land within an urban growth boundary is used efficiently and that any interim, partial or piecemeal development of that land does not compromise its integration (Policy 7.7) 	<p>×</p> <p>The plan change is not supported by any evidence that the proposed urban development will be provided in a way and at a rate that meets the community needs. There is risk that if this Plan Change succeeds as currently proposed, this development could dilute growth and expansion of existing residential areas. I do think consideration should be given to deferring the zoning until there is more need for this land supply which would assist in aligning the Plan Change with these provisions</p>
<p>4.10.1- Objective 1 - Access to Community Housing or the provision of a range of residential activity that contributes to housing affordability in the District. Policies 1.1, 1.2 and 1.3.</p>	<p>×</p> <p>No affordable housing mechanisms have been volunteered.</p>

Part 5 Rural General:

Objectives and Policies	Commentary
5.2 Objective 1 and Policies 1.1 – 1.9: Character and Landscape Values, protecting the character and landscape value of the rural area	✓
<p>5.2 Objective 3: <i>Rural Amenity</i>, avoiding, remedying or mitigating adverse effects of activities on rural amenity.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Recognise permitted activities in rural areas may result in effects such as noise, dust and traffic generation (Policy 3.1) • Ensure rural activities can be undertaken without loss of rural amenity (Policy 3.2) • To avoid, remedy or mitigate adverse effects of activities located in rural areas (Policy 3.3). • Ensure dwellings are setback from property boundaries to mitigate adverse effects of activities of neighbouring properties (Policy 3.5). 	<p>×</p> <p>As outlined earlier in this evidence the proposed Plan Change has the potential to adversely affect the rural amenity of 246 Riverbank Road. Of particular relevance is policy 3.5 specifying that dwellings should be setback from boundaries to mitigate any adverse effects. With the inclusion of the recommended buffer zone I am satisfied the Plan Change would align with these provisions.</p>

Part 7 Residential Areas:

Objectives and Policies	Commentary
<p>Objective 1 - Availability of Land</p> <p>Sufficient land to provide for a diverse range of residential opportunities for the District's present and future urban populations, subject to the constraints imposed by the natural and physical environment.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • Sufficient land to satisfy both anticipated residential and visitor accommodation demand (Policy 1.1) • Maintain a distinction between the urban and rural areas in order to assist in protecting the quality and character of the surrounding environment (Policy 1.5) 	<p>In part</p> <p>This objective and policy provides for the allocation of sufficient residential land to meet the District's present and future urban populations. In this instance it is questionable whether the proposed residential growth is necessary to meet the District's present and future urban populations based on the extent of undeveloped residential zones within Wanaka.</p> <p>As it stands the Plan Changes does not maintain a distinction between the urban and rural areas.</p>
<p>Objective 3 - Residential Amenity.</p> <p>Pleasant living environments within which adverse effects are minimised while still providing the opportunity for community needs.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • To ensure noise emissions associated with non-residential activities are within 	<p>×</p> <p>The amenity of the proposed urban environment could be compromised by the viticulture use of 246 Riverbank Road, in particular noise effects from the operation of the existing frost fan. With the inclusion of the recommended buffer zone I am satisfied the Plan Change would align with these provisions.</p>

limits adequate to maintain amenity values (Policy 3.8).	
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Part 11 Business and Industrial Areas:

Objectives and Policies	Commentary
<p>Objective 1 - Business and Industrial Activity</p> <p>A range of industrial locations which accommodate a variety of appropriate activities, including the maintenance and consolidation of existing business areas.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • To encourage redevelopment within existing business areas by consolidating these areas (Policy 1.2) • To provide for additional industrial land in areas which will not adversely affect existing business activities and is consistent with maintaining the standard of amenities in the area (Policy 1.3). 	<p>In Part</p> <p>There is a risk that by expanding the proposed industrial zone associated effects such as noise, odour and glare will further impact upon the amenity of the rural general land to the south east.</p>

<p>Objective 3 - Effect on Amenities</p> <p>Minimisation of the effects of business and industrial activities on neighbours, other land use activities and on visual amenities.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • To control the location of business activities so impacts of vehicle movements are restricted to main traffic routes (Policy 3.2) • To promote design and layout of new business and industrial areas sensitive to the amenity of neighbouring activities (Policy 3.3) 	<p>In Part</p> <p>Whilst the open green space area will assist in reducing amenity effects on neighbours. The linkage of proposed Road 2 and Road 3 does not restrict industrial traffic movements to main traffic routes and will result in amenity effects on neighbours to the south east. The removal of this linkage would assist in aligning the proposal with these provisions.</p>
<p>Objective 2 (Industrial B)</p> <p>Effectively mitigate the adverse visual effects of business and industrial development, when viewed from public and private places.</p> <p>Relevant policies relate to:</p> <ul style="list-style-type: none"> • To ensure the fixed opens shown on the relevant Structure Plans are provided (Policy 2.3) • To require high quality planting and mounding of the open space areas (Policy 2.6) • To avoid excavation in the 	<p>x</p> <p>The presence of road 3 through the open space area will require excavation and will also reduce the effectiveness of plants screening the industrial development. With the inclusion of recommended amendments in terms of the landscape outcomes required within the open green space buffer and fixing the location of Road 3 I am satisfied the Plan Change would broadly align with these provisions.</p>

open space areas unless for pedestrian connections (Policy 2.7)	
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42 Some aspects of this Plan Change align with the objective and policies contained within the District Plan as outlined in the preceding tables. However, areas where the Plan Change fails to align with these objectives and policies in my opinion provide support for the relief sought by Ian Percy and Fiona Aitken.

Summary

43 The proposal is likely to lead to an oversupply of industrial and residential zoning in Wanaka. The extent of oversupply in terms of the industrial land is unknown and I would like to see some analysis on the potential uptake of the proposed industrial zone before the extent of any new industrial land is determined. Whilst I accept that the land contained within Plan Change 46 will accommodate residential growth at some point in the future I do think consideration should be given to deferring the zoning until there is more need for this land supply. These recommendations are supported by the objectives and policies contained in both the proposed RPS and the District Plan.

44 In my opinion the interface between the proposed Plan Change and the rural general land to the south east needs to be 'softened'. The proposal as it currently stands creates a 'hard' edge of residential zoning with no transition into the rural environment. In order to reduce the combination of amenity and reverse sensitivity effects I believe it is necessary to separate the residential zoning from the Rural General land to the south east with a buffer area. This recommendation is supported by the objective and policies contained in both the RPS and the District Plan.

45 I also consider that further attention needs to be given to mitigating potential effects associated with Road 3. In my view this road should either be removed or further provisions included in the Plan in terms the landscape outcomes required within the open green space buffer and fixing the location of the road.

46 Overall, I believe the following changes are necessary for the proposal to be consistent with Part 2 of the Act (being the sustainable management of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being, whilst also protecting the life supporting capacity of ecosystems, and avoiding, remedying or mitigating adverse effects on the environment):

- Further assessment and analysis in terms of the demand for the proposed industrial zones prior to making a decision on this plan change.
- Performance standards included within the Plan deferring the residential zoning until there is a demonstrated need for this land supply.
- Extension of the open green space area along the south eastern boundary of Plan Change 46 by a minimum of 50m. This green space should remain free of buildings and other structures.
- The deletion of Road 3 and an alternative access point confirmed onto Ballantyne Road to the north or the position of the road be fixed on the proposed structure plan with a minimum 20m setback from the south eastern boundary and the planting and mounding requirements of Assessment Matter 11.6.2 (ii)(x)(e) should be extended to the open green space area associated with the Proposed Industrial B Zone

Ian Greaves

18 August 2015