



FORM 5: SUBMISSION

ON A PUBLICLY NOTIFIED PLAN CHANGE



Clause 6 of First Schedule, Resource Management Act 1991 – as amended 30 August 2010



TO // Queenstown Lakes District Council



YOUR DETAILS // Our preferred methods of corresponding with you are by **email** and **phone**.

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PLAN CHANGE // To which this submission relates to:

Private Plan Change 52

~~I could not~~ gain an advantage in trade competition through this submission.

*I am

** directly affected by an effect of the subject matter of the submission:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition.

* Delete entire paragraph if you could not gain an advantage in trade competition through this submission.

** Select one.



SPECIFIC PROVISIONS // Of the proposal that my submission relates to are:

1. Activity Area 6:
- specifically between the Southern Neighbourhood
and the Pringles Creek boundary
2. Water Demand and Use.

**MY SUBMISSION IS //**

Include whether you support or oppose the specific provisions or with to have them amended; and the reasons for your views.

See Attached.

**I SEEK THE FOLLOWING FROM THE LOCAL AUTHORITY //** Give precise details:

See Attached.

I

do

wish to be heard in support of my submission.

I

will

consider presenting a joint case with others presenting similar submissions.

SIGNATURE

Signature (to be signed for or on behalf of submitter) **

Date

21/3/17

** If this form is being completed on-line you may not be able, or required, to sign this form.



Submission on Private Plan change 52: Mount Cardrona Station

We own the property at 6 Gin & Raspberry Lane (Lot 11DP 304819) which shares 450m of boundary with the southern edge of the Mount Cardrona Station Special Zone, 275m of which is adjacent to “Activity Area 6”

We oppose Plan Change 52 in its current form as we would like:

1) Modification of the Structure Plan and Zone Rules for Activity Area 6:

We seek modification of the structure plan and zone rules so that Activity Area 6 between the Southern Neighbourhood and the Pringles Creek boundary is designated a ‘Reserve’ and as such all building, structures and installation of above ground infrastructure is excluded from this area. This area should be for the separation and mitigation of the built areas of the Mount Cardrona Station Special Zone, from the boundary of the neighboring property and to provide public open space for the residents of the village, while preserving rural amenity value for the residents of the Pringles Creek sub-division.

It would be a similar designation to Activity Area 7b, but would allow mitigation earthworks and planting of species that 7b does not.

The Activity Area 6 adjacent to our boundary is designated as ‘Commonage’ and has been indicated as a buffer zone between the Mount Cardrona Station Village and the properties in the Pringles Creek subdivision. It is part of the ‘Open Space Network’ in the Development Structure of the Design Guidelines.

The Kidson Report which contributed to the original plan change (Plan Change 18) advocated:

“A significant buffer of 100 metres should be enforced along the North West boundary with Pringles Creek. This land area can be utilised for open space and planting”

The Planning Objectives for this area are:

4.14 Within Activity Area 6:

- *To provide for formal and informal public recreation activities and pedestrian trails;*
- *To provide for communal open space areas through the Zone*
- *To restrict buildings in the Activity Area, other than those buildings associated with the functioning of the Village, the provision of access to*

Submission on Private Plan change 52: Mount Cardrona Station

the surrounding recreational activities, the provision of gas storage facilities, a recycling station, and the provision of small scale buildings associated with potential sports fields.

The planning objectives and zone rules run contrary to the aims of open space and mitigation in that they allow built form and infrastructural development in Activity Area 6. (Gas storage, recycling facilities and a sports field are specifically indicated as intended activities.) This defeats the purpose of a buffer zone and compromises rural amenity. It creates outcomes such as buildings and structures, vehicle movement, noise and light, and could encourage further encroachment by any building or activity that is deemed to be “associated with the functioning of the village”. This also creates a precedent whereby further structures even if designated Non - Complying, would be more likely than if the area was maintained as a purely open space mitigation zone and devoid of any infrastructure.

While these planning objectives 4.14, already exist in the operational plan, the Plan Change means that the areas of built development (Activity Areas 1-4) are less able to absorb these activities due to:

- the higher density residential areas, smaller overall footprint of built form and loss of open public space to accommodate the golf course meaning there is less opportunity to accommodate such activities in the built areas.
- the re-orientation of the village centre to a more northerly aspect effectively making the southern boundary, the rear of the development. As such, community infrastructure of a less acceptable nature in the residential areas eg. gas storage and recycling station, is likely be pushed to what is the “back fence” of the zone. Other examples of activities that we can foresee as being “associated with the functioning of the village” but not encouraged within the residential areas are:
 - water treatment, storage or reticulation
 - rubbish collection
 - roading depot
 - grounds keeping depot
 - vehicle parking e.g. buses, coaches, camper vans

Four other areas are defined as Activity Area 6 in the structure plan. They are:

- the two ‘open space fingers’ which run through the centre of the village.
- the two areas either side of the Ski Area access road.

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All are likely to be considered unsuitable for the activities described above as:

- Many of the residences directly overlook the ‘Open Space fingers’
- The areas beside the main road are prominent locations. They are entry points to both the village and Cardrona Ski Field. Being a busy section of road, access to these areas would be restricted to the entrance roads. In addition, their high visibility, distance from the residential areas, and the historical context provided by the Cemetery and the Woolshed would restrict what is appropriate here.

These factors all limit the ability for community infrastructure to occur elsewhere in the zone. This makes it more likely that these facilities are located in the “Commonage” to the south of the Southern Neighbourhood

The objectives also encourage the provision of other ‘formal and informal public recreation activities’. Specifically indicated is a ‘Sports Field’ but these activities could also be facilities such as a playground, tennis courts, basketball court, skate park, bmx park, or mountain bike terrain. Any of these will require built structures, and have the potential for noise, vehicle movement and light spill.

The sports field in particular is an anomaly in this location. In the operational plan, it is attached to the Educational & Community Precinct (3b). In the Plan Change, this precinct has been deleted but the sports field remains, and has in fact been moved further up the slope.

A sports field here is inappropriate as:

- the contour lines on the Concept Master Plan indicate a vertical fall of 12m over the length of the area, so any playing surface would require extensive earthworks to create a level area.
- a sports field would require ancillary buildings such as toilets, changing rooms, storage for gear, equipment and machinery, and vehicle parking
- to be an effective and useful facility it would require floodlighting.

A sports field would be far more appropriate on the flat valley floor, in a more centrally located position where it can be a shared facility with Cardona Village, and where issues such as buildings, noise, traffic and light have less impact on the surrounding countryside.

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2) Clarification of Water Supply Requirements and Its Impact on Pringles Creek:

We seek clarification regarding the total water requirements of the Proposed Plan Change 52 and the ability for those requirements to be provided for, without long term detrimental effects to the surrounding natural environment and in particular Pringles Creek.

Pringles Creek runs through our property, providing considerable amenity value, potable water supply to the subdivision, and supporting local flora and fauna, including fish

The Plan Change has an increased number of dwellings to the Operational Plan (622 from 576 – Insight Economic Impact Report). In addition to this, it also has a hotel indicated as having 140 rooms, and 28 hectares of golf course, much of it requiring irrigation to meet the high standards that are envisaged. This is a significant increase in the year round water requirements of the zone.

The Assessment of Effects on the Environment only mentions that water consents are in place and are “sufficient”.

10. Effects in relation to water supply and waste water disposal

Water is required for potable domestic supply and for irrigation of the golf course.

Mt Cardrona Station Limited has two current water permits:

- *Consent 2009.191 (ORC) to take and use water as primary allocation from Pringles Creek and the Cardrona River for communal domestic supply, commercial supply and irrigation. Its expiry date is 1 March 2030;*
- *Consent 2009.435 (ORC) to take and use water as a primary allocation from Pringles Creek for irrigation. Its expiry date is 1 March 2030.*

Both consents are conditional on protecting the residual flow in Pringles Creek as well as being subject to substantial performance monitoring conditions. The water permit volumes are sufficient for the needs of the full development of the MVSSZ (both potable and non-potable requirements).

The Ecological report addendum makes no mention of water requirements at all.

There is no data provided, or analysis made of the total daily water requirements of the zone, extraction volumes necessary, or storage requirements.

The majority of the water is stated as coming from Pringles Creek, however Pringles

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Creek is completely outside the Mount Cardrona Station Special Zone. Section 32 analysis only assesses the objectives of the RMA for Sustainable Management and Ecological values within the zone and similarly the zone rules only concern themselves with watercourses within the zone. Neither affords Pringles Creek any evaluation or protection.

The sole mechanism for protection of the stream that is indicated in the Plan Change is the Residual Flow Requirements of the permits, but without sufficient analysis there is no way of establishing the likely volume of water extraction, the impact this will have on the stream, and the potential for the stream to be reduced to long periods or even a permanent state of Residual Flow.

Such a condition could be considered be contrary to Sections 5 & 7 of the RMA:

- 5(b) Safeguarding the life-supporting capacity of air, water, soil, and ecosystems*
- 5(c) Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*
- 7(b) The efficient use and development of natural and physical resources*
- 7(c) The maintenance and enhancement of amenity values*
- 7(d) Intrinsic values of ecosystems*
- 7(f) Maintenance and enhancement of the quality of the environment*
- 7(h) The protection of the habitat of trout and salmon*

To preserve the existing Pringles Creek ecology and amenity we would like to see more detailed analysis, implementation of effective safeguards and robust water management measures to ensure sufficient volumes of storage and maximum water efficiencies within the zone.

Opportunities exist to minimise water demand from the surrounding environment by retaining as much water as possible for re-use within the zone. Current zone rules and design guidelines seek to “encourage” individual homeowners to collect storm water and grey water (Infrastructure Objective 7.7 & Building Design 3.7). Provision should be made to ensure the capture of all stormwater and grey water from all buildings, store this appropriately and use it for irrigation of the golf course and public areas. Individual households could still capture their own for domestic use, but excess should be reticulated to the community scheme to ensure the complete retention and re-use of all suitable water.

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In Summary:

Unless the zone rules are modified with regard to Activity Area 6, there is a very real possibility of infrastructural encroachment into an area indicated as a buffer and mitigation zone, which brings with it negative outcomes such buildings, structures, noise, traffic movement, light spill, and the loss of open space and its amenity values

The Plan Change increases this likelihood by reducing opportunities for such activities to be absorbed within the built areas of the zone, and reorientating the zone such that the Pringles boundary becomes the “rear” of the zone.

A Sports Field is unsuitable in the indicated location and would be a more effective facility at a better considered site.

The ability of Pringles Creek to service the majority of the water requirements of the zone, without being adversely affected needs to be thoroughly examined, verified and safeguarded.

We seek the following from the Local Authority:

- Activity Area 6 between the Southern Neighbourhood and the Pringles Creek boundary is redesignated a Reserve area solely for the purposes of open space amenity and mitigation, and is protected from encroachment by infrastructural facilities associated with the functioning of the village, and recreational activities that require built form.
- Removal of a sports field from this area
- Effective zone rules and objectives that:
 - ensure the protection of water courses outside of the Mount Cardrona Station Special Zone, where they will be affected by activities occurring within the zone.
 - Target water efficiencies across the zone in order to reduce water demand.