

Before Queenstown Lakes District Council

In the matter of The Resource Management Act 1991

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

STATEMENT OF EVIDENCE OF DUNCAN WHITE FOR

Sunnyheights Limited (previous submitter Crosshill Farm Limited (#531))

Dated 4 April 2017

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**anderson
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Qualifications and Experience

- 1 My name is Duncan Lawrence White. I hold the qualifications of a Bachelor of Science in Geography, a Diploma for Graduates and a Post Graduate Diploma in Science. Both of the latter two qualifications are in Land Planning and Development. These qualifications are all from the University of Otago.
- 2 I have over 14 years experience as a planner. I have seven years planning experience with the Manukau City Council, including three years as a subdivision officer processing subdivision resource consent applications, followed by four years as an environmental policy planner undertaking district plan changes, policy development and the acquisition of reserves. For the past seven years I have lived in Wanaka and worked as a planner for Paterson Pitts Limited Partnership (Paterson Pitts). Paterson Pitts is a land development consultancy that undertakes a variety of rural and urban subdivision, resource consent applications and plan change work, primarily around Wanaka.
- 3 In preparing this evidence I have reviewed:
 - (a) The reports and statements of evidence of other experts giving evidence relevant to my area of expertise, including:
 - (i) The PDP planning maps, Map 18;
 - (ii) S42A Hearing Report – Upper Clutha Mapping, including the S32AA evaluation of relevant recommended changes and supporting evidence.
 - (iii) S42A Hearing Report – Upper Clutha Mapping, - Group 3 Mapping including the S32AA evaluation of relevant recommended changes and supporting evidence.
 - (iv) The landscape evidence of Ben Espie for Sunnyheights Ltd
- 4 I have read the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2014. This evidence has been prepared in accordance with it and I agree to comply with it. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

Scope of Evidence

- 5 This evidence has been prepared on behalf of Sunnyheights Ltd in relation to submission (#531). Submission #531 was lodged by the previous owner

(Crosshill Farm Ltd) of the sites on the southern side of Dublin Bay Road, Wanaka (Lots 1 – 3 DP 26282 and Lot 3 DP 27742 – totalling 341 hectares).

- 6 Submission #531 has four components:
 - The location of the boundary between Outstanding Natural Landscape (ONL) and Rural Landscape Classification (RLC).
 - The rezoning of the areas of the site that are not ONL from Rural to Rural Lifestyle zone.
 - The identification of the Significant Natural Area (SNA) (E39A) within the site.
 - Various changes to the objectives and policies of Chapter 3 (Strategic Direction), Chapter 6 (Landscapes), Chapter 21 (Rural).
- 7 The submission topic seeking the rezoning of the RLC area of the site from the Rural as included in the Proposed District Plan to Rural Lifestyle (paragraphs 7 – 9 of the submission) is still live as an alternative relief, but the primary and preferred relief sought is amendments to the Rural chapter provisions as advanced in previous hearings.
- 8 Likewise the removal of the SNA (E39A) is still live, but not being actively pursued.
- 9 The amendments to the Chapter 3 – Strategic Direction objectives and policies were considered as part of Hearing Stream 1B, as were the objectives and policies from Chapter 6 – Landscape. Hearing Stream 2 considered the objectives and policies of the Rural zone.
- 10 This just leaves the issue of the location of the ONL line as the primary issue for this hearing stream. Evidence about the location of the landscape line is being provided by Ben Espie.

Submission Background

- 11 The final bullet point of paras 6 and 9 (above) touch on the submission points that relate to the objectives and policies of Chapter 3 (Strategic Direction), Chapter 6 (Landscapes), Chapter 21 (Rural). In relation to these objectives and policies, there has been no interim decision issued on the text, this evidence therefore relies on the amended version of the text to these chapters provided in the relevant S42A report.

- 12 For the Strategic Direction and Landscape hearing (Hearing 01B) I provided evidence on behalf of the submitter in relation to Objective 3.2.5.1, Policy 3.2.5.1.1 and Objective 3.2.5.2 that additional rural living subdivision and development, provided this is appropriately designed and located will give rise to significant economic and social benefits that will outweigh landscape concerns. The primary change sought from the s42A version of Objective 3.2.5.1 was the amendment of this objective to read “*Protect the natural character of Outstanding Natural Landscapes and Outstanding Natural Features from inappropriate subdivision, use and development*” (my emphasis). The amended objective was sought to specifically provide for one of the matters of national importance (RMA s6(b)) which is “*the protection of outstanding natural features and landscapes from inappropriate subdivision, use and development*”. Without the word ‘inappropriate’ the s42A version results in a wider, and very much more restrictive test than the outcome sought by s6(b). For further details on this submission point the commissioners are referred to my evidence on that hearing stream.
13. Relevantly for Crosshill’s submission my evidence also covered Policy 6.3.1.11 and sought that this policy should be amended to read “*Recognise the importance of avoiding, remedying or mitigating adverse effects on landscape character and visual amenity values as viewed from public places.*” In that evidence I considered that this policy can appropriately use the RMA phrase ‘avoiding, remedying, or mitigating’ because this is in the context of a policy which applies to a very wide range of views, some of which may be important and some may not.
- 14 In relation to the Rural hearing (Hearing 2) Crosshill relied (via legal submissions of Maree Baker-Galloway on behalf of various entities including Darby Planning LP) the evidence of Ben Farrell (on behalf of Wakatipu Equities) and Jeff Brown (on behalf of Kawareau Jet) that the Rural provisions are disproportionately balanced in favour of farming as a mechanism to protect landscape character and does not enable appropriately designed and located development that would, on some sites, enable the same outcomes and provide for sustainable management of rural resources.

Location of ONL/RL Boundary in Dublin Bay

- 15 Evidence about the location of the boundary between the Outstanding Natural Landscape (ONL) and the Rural Landscape (RL) through Crosshill Farm (on the

southern side of Dublin Bay Road, Wanaka) has been provided by Ben Espie. The proposed amendments to the Rural and Landscape objectives and policies described above will be appropriate for the landscape classifications provided in Mr Espie's evidence.

Dated this 4th day of April 2017

Duncan White