

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER OF the Resource Management Act 1991

AND

IN THE MATTER OF the Queenstown Lakes Proposed District Plan

Chapter 3 (Strategic Direction),
Chapter 4 (Urban Development) and
Chapter 6 (Landscape)

SUPPLEMENTARY EVIDENCE OF KIRSTY O’SULLIVAN
(Submitter 433 and Further Submitter 1340)

(30 March 2016)

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1. INTRODUCTION

Qualifications and Experience

- 1.1 My name is Kirsty O'Sullivan. I am a Senior Resource Management Consultant with the firm Mitchell Partnerships Limited.
- 1.2 My qualifications and experience are set out in paragraphs 1.1 to 1.4 of my statement of evidence on the Chapter 3 (Strategic Directions), Chapter 4 (Urban Development) and Chapter 6 (Landscapes), dated 29 February 2016.
- 1.3 I have read and agree to comply with the Environment Court's Code of Conduct for Expert Witnesses contained in the Practice Note 2014. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.

Scope to Supplementary Evidence

- 1.4 This supplementary brief of evidence relates specifically to the Queenstown Lakes District Council's redrafted objectives for Chapters 3 and 6 of the Proposed Plan.
- 1.5 In preparing this supplementary brief of evidence, I have read the Minute issued by the Hearings Panel on 23 March 2016 and have reviewed the Memorandum of Counsel for the Queenstown Lakes District Council dated 18th March 2016 containing the redrafted objectives in Chapters 3 and 6 of the Proposed Plan.
- 1.6 I have also read the Expert Witness Conferencing Statement dated 22 March 2016. I took part in the Expert Witness Conferencing that occurred on 18th March 2016.
- 1.7 I provide the following comments and observations with respect to the redrafted provisions¹.

¹ Note: Black underlined text for additional and ~~strikethroughs~~ for deletions shown recommended changes to the notified chapters, in version attached to s42A report, dated 19 February 2016. Further changes shown in purple reflect the working draft dated 18 March 2016, as directed to be provided by the Panel at Hearing 1A and 1B.

Redrafted Objectives

Objective 3.2.1.2

~~*Recognise, develop, sustain and integrate the The key mixed use function of the wider Frankton commercial area, is enhanced, with better transport and urban design integration between comprising Remarkables Park, Queenstown Airport, and Five Mile and Frankton Corner.*~~

Objective 3.2.1.7

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

- 1.8 Objectives 3.2.1.2 and 3.2.1.7 were subject to Expert Witness Conferencing on Friday 18th March 2016. For the reasons set out in the section 32AA evaluation prepared during Expert Witness Conferencing, I maintain that the aforementioned objectives should reflect the outcomes discussed and largely agreed to during Expert Witness Conferencing².

Objective 6.5.2

~~*Protection of the natural character quality of the Outstanding Natural Features and Landscapes and Outstanding Natural Features from inappropriate subdivision, use and development.*~~

- 1.9 Objective 6.5.2 was subject to Expert Witness Conferencing on Friday 18th March 2016. Since conferencing, a further amendment to the objective has been proposed. Specifically, the term "quality" has been removed from the objective.
- 1.10 In my opinion, the consideration of the landscape qualities is inherent in this objective. I therefore support the post conferencing amendment to this objective.

Objective 6.3.1

~~*The District contains and values Outstanding Natural Features, 6.3.1 Outstanding Natural Landscapes, and Rural Landscapes that require*~~

² I note that Matthew Paetz agreed in principle with the general direction of the changes shown in the Expert Witness Conferencing Statement.

protection from inappropriate subdivision and development Landscapes are managed and protected from the adverse effects of subdivision, use and development.

- 1.11 As originally notified, this objective sought to protect various landscapes from “inappropriate subdivision and development”. In order to recognise and provide for circumstances where the operational, technical or safety related requirements of infrastructure may necessitate a particular location (as sought by QAC’s recommend new Policy 6.3.1.12), it is imperative that this objective maintains reference to “inappropriate” subdivision, use or development. Similar amendments to Objectives 6.3.3, 6.3.4 and 6.3.5 would also be required to achieve this outcome.

Kirsty O’Sullivan

30 March 2016