

**BEFORE THE HEARINGS PANEL
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Stream 15

**REPLY OF JEANNIE ELLEN GALAVAZI
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

CHAPTER 38 OPEN SPACE AND RECREATION

15 October 2018

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1. INTRODUCTION

1.1 My name is Jeannie Ellen Galavazi. I prepared a statement of evidence in chief and rebuttal for focused on parks operational issues for the Chapter 38 Open Space and Recreation Chapter of Hearing Stream 15. My qualifications and experience are listed in my evidence dated 23 July 2018.

1.2 I have reviewed the relevant summaries of evidence filed by other expert witnesses , attended part of the hearing on 4 September 2018 and have been provided with information from submitters and counsel at the hearing, including reports of what (relevantly) has taken place at the hearing.

1.3 This reply evidence covers the following issues:

- (a) The appropriateness of Open Space Zone only being applied to Council Controlled Land;
- (b) Mr Duncan White for the Wanaka Marina (2232);
- (c) Mr Warwick Goldsmith and Mr Andy Carr for Bridesdale Farm Developments Ltd (655, 2391);
- (d) Legal Submissions dated 13 September 2018,¹ and Memorandum of Counsel for Bridesdale Farm Developments Limited dated 21 September 2018²; and
- (e) Ziptrek (NZ) Limited (2485).

1.4 The following are attached to my reply evidence:

- (a) **Appendix A:** Lake Hayes Estate and Shotover Country Community Association Learners Draft Mountain Bike Trail Plan.

1 <https://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/PDP-Stage-2/Stream-15-Submitter-Legal-Submissions/S655-Bridesdale-T15-Goldsmith-W-Legal-Submissions.pdf>

2 <https://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/PDP-Stage-2/Stream-15-Evidence-Post-Hearing/S2025-Bridesdale-T15-Goldsmith-W-Memo.pdf>

2. THE APPROPRIATENESS OF OPEN SPACE ZONE ONLY BEING APPLIED TO COUNCIL CONTROLLED LAND

2.1 During my appearance at the hearing the Panel queried why the Open Space Zones should only be applied to council controlled land and not private land, and whether there were any further differences other than the Reserves Act 1977. I wish to clarify the process by which the QLDC Parks and Reserves Department (**Parks**) makes decisions for whether activities or developments are appropriate on reserve land. Parks manage all reserves as an open space and recreation network in accordance with a suite of legislation and planning documents, not just the Reserves Act 1977 (although this is our primary legislation). Council as landowner also has responsibilities to provide parks and reserves under s11a of the Local Government Act 2002 (LGA):

11A Core services to be considered in performing role

In performing its role, a local authority must have particular regard to the contribution that the following core services make to its communities:

(a) network infrastructure:

(b) public transport services:

(c) solid waste collection and disposal:

(d) the avoidance or mitigation of natural hazards:

(e) libraries, museums, reserves, and other recreational facilities and community amenities.

2.2 In addition to Reserve Management Plans prepared under the Reserves Act 1977, Parks is continuously preparing and implementing strategic planning documents such as development plans, landscape concept plans, and leases and licences for commercial and community activities. These are all prepared in consultation with key stakeholders and the public to some degree. The public also has the ability to input into Long Term Plans and Annual Plans, which direct the Parks work programme and level of investment for the aforementioned plans and development on reserves. Approval for any new activity or development on a reserve, either by council or third parties, is assessed under all relevant documents, legislation and strategic plans. This level of control and assessment does not apply to private land.

- 2.3** In essence the Council has taken an approach where the Open Space Zones in the PDP do not provide unnecessary duplication of Reserves Act regulation, where they in fact would apply. Those Reserve Act controls only exist over Council reserve land.
- 2.4** Those Reserve Act controls do not, and would not, apply over land that is not owned by the Council and that doesn't hold reserve status. In that situation, there is no duplication of regulation as the Reserves Act has no relevance whatsoever. That is why I maintain that it is appropriate that the Open Space Zone is only applied to Council controlled land.
- 2.5** In the event that the Open Space Zone is applied to private land, Ms Edgley describes in her reply additional provisions that would be required to ensure development is appropriate as there will not be the additional controls set out above that apply to Council controlled land.

3. MR DUNCAN WHITE FOR WANAKA YACHT CLUB (2232)

- 3.1** During the hearing and in his evidence Mr White gave the view that the Active Sport and Recreation Zone (**ASRZ**) is more appropriate than Informal Recreation Zone for the lakefront area where the Wanaka Yacht Club is located. **Figure 1** below demonstrates that only a small proportion (outlined in yellow) of the foreshore in the vicinity of the yacht club is council owned reserve. Only the yacht club and carpark is within the notified Informal Recreation Zone; whereas the boat ramp, jetty and marina are all on the lake edge or surface of the water and as such are LINZ land and zoned Rural.



Figure 1: Map of Wanaka Yacht Club and Wanaka Marina

3.2 As such, the existing recreational activity does not occur within the notified informal recreation open space zone. Given this, and the special character of the lake margin, I still maintain that Informal Recreation Zone is more appropriate.

4. WARWICK GOLDSMITH FOR BRIDESDALE FARMS DEVELOPMENT LTD (655, 2391)

4.1 Mr Warwick Goldsmith, Counsel for Bridesdale Farms Development Ltd (BFDL) raised at the hearing that one of the three parcels of reserve land at the end of Widgeon Place has not been zoned Open Space Zone and retains the Rural Zone. I confirm this is a mapping error and it was intended that the parcel PT SEC 131 BLK III SHOTOVER SD be notified as Open Space and Recreation Informal Recreation Zone, consistent with the adjacent reserve parcels.

4.2 Mr Goldsmith stated at the hearing that Council did not wish to take the land when offered at the Bridesdale Special Housing Accord hearing. I dispute this statement as I attended this hearing on behalf of Parks and Councils' position on this offer (confirmed at a Council workshop) was that the parcel of land could be accepted as land to be vested as

recreation reserve, however as the offer was conditional on houses being approved within the notified ONL, Parks did not wish to accept the offer. At the time my view was that the most appropriate and most likely use would be informal recreation such as walking, biking and horse riding and any future change in use would be rigorously assessed against the constraints, namely the flooding hazard, access limitations and the notified ONL.

4.3 Mr Goldsmith also raised the issue of open space and recreation supply in the District and asks where people are going to recreate. I note he quoted from the Lake Hayes Estate and Shotover Country Community Association's (**Association**) submission to QLDC's 2018-2028 Long Term Plan.³ He then goes on to state that QLDC has not done the planning work to determine how and where people will recreate. While I agree with Mr Goldsmith that there are increasing demands on the existing open space network and that more provision will be required to meet the future needs of the district, I do not agree that there is complete absence of work by Council to determine the open space and recreation needs or that the Parks and Open Spaces Strategy 2017 (the Strategy) does not provide any assessment of existing or future needs of open space and recreation.

4.4 Provision guidelines are set out in the Strategy and are used to determine what open space is provided in all new subdivisions. These are shown in the table below:

3 Parks and Open Spaces Strategy 2017 p29.

TYPE	PROVISION GUIDANCE
Local Park	Each local park requires a minimum of 0.3ha of open space in greenfield developments . This should be of a configuration that provides transition / buffer space from adjacent roads and housing and contains a flat kick-around space of approximately 30 by 30m . Residents should have access to a local park within a 600m walk (approximately 5 to 10 minutes) A local park is required for every 400 household units in greenfield developments.
Community Park	A Community Park requires a minimum of 2ha of open space and should be of generally flat or undulating land . They should be located to create or enhance open space and community connectivity. Residents in residential zones should have access to a Community Park within a 1500m walk. A Community Park is required in greenfield developments where there are 2000 household units or more.
Sportsground Park	A Sportsground Park should be of a configuration that can provide a minimum of two full-sized sports fields in a side-by-side configuration. A Sportsground Park can serve a multi-use function with a Community Park. A Sportsground Park is required in greenfield development areas catering for more than 2000 households
Premier Park	No quantity guidance. Existing parks will be identified as being Premier Parks and upgraded where required. Civic spaces are limited to existing reserves in existing town centres. Should a new town centre be created however the civic space reserve should reflect the scale of the urban centre.
Connections	No quantity guidance, amount will depend on characteristics of the area such as: <ul style="list-style-type: none"> > If water bodies are present that trigger esplanade reserve requirements > The location of walkways and cycleways within greenfield developments > Opportunities to link to waterbodies such as lakes and rivers > Opportunities to link to nearby open spaces > Opportunities to link with existing active transport networks
Natural	No quantity guidance. Amount will depend on characteristics of the area

4.5 The implementation of the Strategy also requires preparation of a series of Open Space Network Plans for each area of the District that analyse existing provision, connectivity and quality of park types.⁴

4.6 Additionally, the Queenstown Lakes – Central Otago Regional Sports Facility Strategy 2018 (Draft Regional Sports Facility Strategy 2018) is in the final stages of being drafted and will be finalised by the end of 2018. While appreciating the document is not final and therefore available for the Panel, this strategy is a sub-regional approach to the planning and development of sport and recreation facilities in Queenstown Lakes and Central Otago, with the outcome being an informed strategic approach to sport and recreation facility planning, both for the development of new facilities and the management of existing assets for the Queenstown Lakes/Central Otago communities.

4.7 Concurrently, the QLDC Sportsfield Demand Strategy is also being drafted for Council. This study, also due for completion at the end of 2018, is being undertaken to identify the supply and demand for sports

⁴ Parks and Open Spaces Strategy 2017 p 33.

fields in the Queenstown Lakes area. This review is being conducted to help to identify future priorities for investment into sports fields to address the changing needs of sports codes and the impact of population growth. The focus of the study is community use of winter sports fields for football and rugby.

- 4.8** Mr Goldsmith provided a recent Request for Proposal put out by Council for the Queenstown Events Centre and the Wanaka Recreation Centre Master Plans. The Masterplans are a continuation of the strategic planning that Council is currently undertaking to provide Council with a 30-year development blue print primarily for the two existing facilities and land upon which these are located.
- 4.9** Considering the above, I disagree with Mr Goldsmith's statements that Council is not planning for the future open space and recreation needs of the District and I consider that the Council, through these strategic pieces of work, is actively planning for the future open space and recreation needs of the district.
- 4.10** With regards to the appropriate zoning for council owned reserve land and in the event BDFL land was zoned open space, I maintain that Informal Recreation Zone is most appropriate. Following on from the Association's submission to the Annual Plan, which Mr Goldsmith referenced during the hearing, the Parks Department have been undertaking regular and direct consultation with the Association since May 2018. Draft plans submitted in July 2018 by the Association for a learner's mountain bike track is consistent with Informal Recreation Zone, these plans are currently being refined with the Parks team to allow for the maximum length of trail. These plans are included as **Attachment A**. Tennis courts, informal sportsfields, pump tracks and biking and walking trails can all be provided under this zone as they are at other reserves such as McBride Park in Lake Hayes Estate, Williams Street Reserve in Fernhill, and Jardine Park in Kelvin Heights. The Active Sports and Recreation or the Community Purposes Zone are for large scale facilities that have a high degree of organised sport and events.

- 4.11** Further to this, Mr Goldsmith stated at the hearing that he considers the BDFL garden plots and associated gardening activity to be Active Sport and Recreation and subsequently all of the land including the Council controlled reserve below Bridesdale Farm should be zoned ASRZ. I disagree that gardening is a formal, organised activity and this is consistent with the new definition of Organised Sport and Recreation in Ms Edgley's reply.
- 4.12** Mr Goldsmith stated at the hearing that there is benefit to the community and council for private landowners to provide recreation facilities on their land. Little evidence has been provided that demonstrates the public need for a private tennis academy or a private equestrian centre and that these facilities meet the most pressing needs for open space, sport and recreation demand in the District. These proposals have not been done in partnership with Council and are not subject to the same level of strategic and coordinated planning as described earlier in my reply. For example, Shotover Country Limited is also considering developing an Equestrian Centre on the same river flats approximately 2.5km to the west of the BDFL land. Two Equestrian Centres within close proximity at the edge of a low to medium density residential subdivision in my view is not strategic provision of recreation facilities. Early findings from the Draft Regional Sports Facility Strategy 2018 are that most facilities now need to be more multi-purpose and adaptable to better meet the needs of a wider range of activities and users. Also, there is no assurance to Parks from BDFL or Winton Partners that public use of the land and/or facilities will be free and readily available, or how conflict between public and commercial recreational users will be managed.
- 4.13** Finally, Mr Goldsmith also raised during the hearing that other developments such as a gondola terminal, ferry and jetty and associated car parks have also been proposed on this reserve area, and that preferred access to the proposed Tennis Academy and possible Equestrian facilities would be from Widgeon Place. The location of these types of infrastructure has huge potential to affect the viability of the recreational use of the recreation reserve. In my view this highlights the importance of strategic open space and recreation planning for how the reserve land and the adjoining private

land (should this be acquired by Council in future) should be developed and how this fits within the wider open space and recreation network.

4.14 Therefore I maintain the view that Informal Recreation Zone is the most appropriate zone for the Council controlled reserve areas and that Active Sport and Recreation zone is not appropriate for the adjoining BDFL owned land.

5. MR ANDY CARR FOR BRIDESDALE FARM DEVELOPMENTS LIMITED (655, 2391)

5.1 Mr Carr, during his appearance at the hearing, stated the land will be a 'low traffic generator' even if zoned ASRZ. I appreciate I am not a traffic engineer in making these statements nor have I run specific testing or analysis. However, I make the observations based on my experience in planning for reserves that include formal sportsfields and facilities. Typically any formal, organised activities in this District and that are sub-regional or regional tournaments, generate high volumes of traffic due to participants travelling the far reaches of the District and from Central Otago and Southland townships.

5.2 In my observations facilities like equestrian centres require large vehicles and trailers. A gondola terminal, particularly one that serviced Remarkables Ski Field and a ferry park and ride would also presumably generate additional traffic. I do not agree that the use of the area is all in off peak, nor that this will reduce demand. The Queenstown Events Centre, while zoned Community Purposes Zone, currently experiences significant congestion and parking issues, predominantly in the late afternoon and on the weekends. When considering future uses of the Widgeon Place reserve land, I consider access to and through the reserve as a key constraint.

6. ZJV (NZ) LIMITED (ZJV) (2485)

6.1 During ZJV's appearance at the hearing the Panel asked if the Queenstown Hill Ben Lomond Reserve Management Plan contemplates that the forest will always be there. The reserve is

designated⁵ for Forestry purposes to allow the Council to carry out forestry operations within the reserve.

- 6.2** The Ben Lomond and Queenstown Hill Reserves Management Plan 2005 requires the preparation of a forestry plan.⁶ This is currently being reviewed. The exotic forest needs to be managed and replaced over time primarily due to the wilding conifer threat and fire risk.

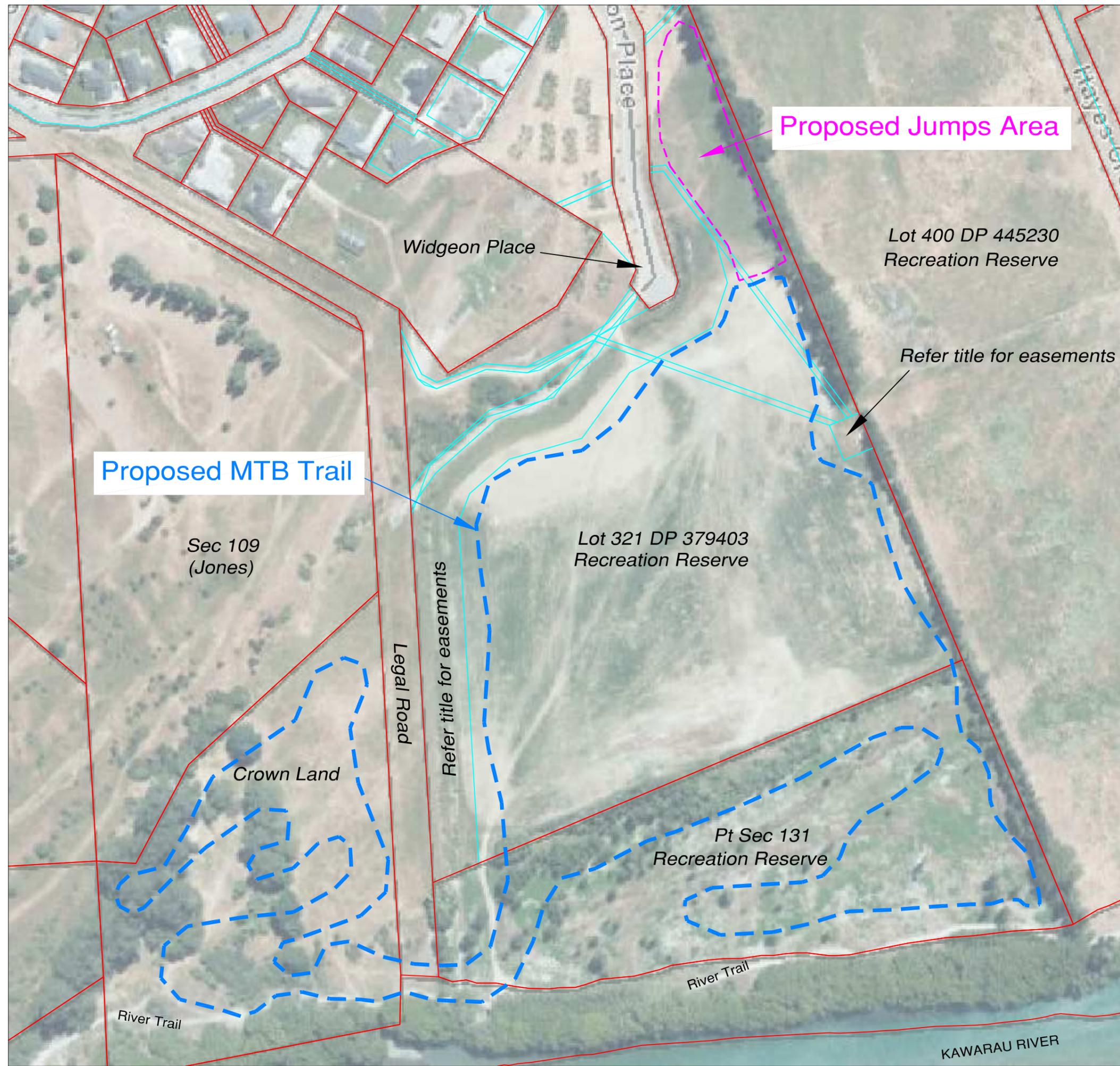


Jeannie Ellen Galavazi

15 October 2018

5 Designations #373, #374, #375, QLDC District Plan
6 Ben Lomond and Queenstown Hill Reserves Management Plan 2005 p 33

Appendix A
Lake Hayes Estate and Shotover Country Community Association Learners
Mountain Bike Trail Plan



Proposed Jumps Area

Proposed MTB Trail

Proposed MTB Trail
Loop Length: 2.6km
Grade 3 with Grade 4 options
Similar in style to Jardines Park MTB trail

Proposed Jumps Area
Small version of beginner and intermediate dirt jumps.
An easier version of Gorge Road

Lake Hayes Estate MTB Trail Widgeon Place



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