

Response to Further Information Request

To	Stephanie Frame and Max Gander-Cooper
From	Werner Murray
Date	19 July 2021
Subject	COVID-19 Recovery (Fast-Track Consenting) Act 2020 – Flints Park, Ladies Mile ` Pūtahi – Request for further information

This is a response to Ministry for the Environment's further information request dated 5 July 2021.

1. *How many full time equivalent (FTE) jobs will be created per annum.*

For more detailed information, please refer to Appendix 1. We have included a development timeline that also estimates the number of FTEs over time for each phase of construction looking at the design and construction components of the development. The table provides a summary of the development timeline but also includes permanent jobs that would be created as a result of the development.

<i>FTEs</i>	<i>2021</i>	<i>2022</i>	<i>2023</i>	<i>2024</i>	<i>2025</i>	<i>2026</i>	<i>2027 onwards</i>
<i>Design</i>	3	4	8	6	2		
<i>Construction</i>		25	20	47	16	40	
<i>Early learning centre</i>						18	
<i>Visitor accommodation</i>							7
<i>Gallery</i>							6
<i>Hospitality</i>							20
<i>Total</i>	3	29	28	53	18	13	33 (51 ¹)

2. How the Project will contribute to well-functioning urban environments, with particular reference to policy 1 of the National Policy Statement for Urban Development

Flint's Park has adopted universal design principles to cater for a diverse community at all stages of life. In order to achieve this the project has proposed to provide for a wide range of uses that cover aspect of culture, heritage, education and visitor accommodation. The project allows for a diversity in living options, while providing for a focal point for the community based on the homestead and grounds. A key function is also to provide for trails and cycle/pedestrian walkways provide connections to the countryside.

It is widely acknowledged that there is a demand for housing in Queenstown that suits the needs of residents of Queenstown and is affordable. The subject site has been earmarked as one of multiple along Ladies Mile that can absorb development. This projects aims to enable the development to move forward in a timely manner. Appendix 2 contains a memo prepared by Weir and Associates that further addresses the matters set out in Policy 1 of the National Policy Statement for Urban Development in further detail.

It is also worth noting that the design has considered the Kāi Tahu Ki Otago Natural Resource Management Plan. It has been important for the project to be located outside of culturally significant and highly visible landscapes, and to adopt the approach of having an accidental discovery protocol during earthworks.

Given that traffic is one of the major contributor to emissions and greenhouse gasses, the most important aspect that this proposal can provide with regard to responding to this challenge is to support modal shift – particularly towards walking and cycling. This is principally achieved by having highly connected and legible urban form coupled with expansive greenway routes that link (or will link in future) to surrounding development areas and proposed bus route / stops. To support this, every effort is being made to reduce the provision for, and impacts of, motor vehicles. This includes more pedestrian centric design and use of rear service lanes.

The other key response is the range of buildings typologies and associated construction techniques. Every effort has been made to optimise the use of compact, attached house forms which inherently use less materials and have less embodied energy than larger free-standing dwellings. Along with is they will achieve high levels of thermal performance and solar access which

¹ 51 staff includes the 18 permanent staff from the early learning centre.

reduces energy consumption. Collectively these elements deliver a meaningful response to emissions and greenhouse gasses. The design team have been in discussion with prefabricated building firms that are located in Cromwell that can deliver buildings that are almost to passive house standards and provide for a significant reduction in construction waste.

3. Additional information on the potential effects on the scheduled Glenpanel Homestead building

Part of the QLDC Te Pūhahi Ladies Mile Masterplan has been to undertake a heritage study over Ladies Mile including Glenpanel. Robin Miller of Origin consultants undertook this work. In discussions with Robin in regard to Glenpanel Homestead, he has said:

"to retain its monetary and heritage values and ensure its future survival, the need for its adaptive reuse must be considered. This is similar to what has occurred within the district at Ayrburn Farm. Its best heritage-conservation outcome for the future may derive from its heritage-sensitive change of use and development to a valued building/site (and other utilitarian buildings) that provides a key service to the mixed-use development. The homestead's heritage values may be best retained by change of use to a heritage-focused community facility, such as a restaurant and local retail complex. The options for change should be weighed against the outcomes they present to retain the heritage values of this building including its materials, design authenticity, and setting."

This approach is similar to what has happened at a number of heritage buildings in Queenstown and surrounds.

4. How the Project will meet the 'gateway' tests in section 104D of the RMA?

Section 104D of the RMA states that the decision maker may only grant a resource consent for a non-complying activity if it is satisfied that (a) the *adverse effects* of the activity on the environment will be no more than minor (noting the focus on adverse effects, rather than simply the extent of change); or (b) that the activity will not be contrary to the objectives or policies of the relevant plan or proposed plan (noting that "contrary to" means repugnant to a "fair appraisal of the objectives and policies read as a whole"). Importantly, only one of the two "gateway" tests under section 104D need to be met.

For the reasons given below, both gateway tests are considered met in this case.

Effects on the Environment

In preparing this application the following effects on the environment have been considered.

- Landscape and visual amenity effects
- Spatial context
- Urban design and residential amenity
- Servicing and infrastructure
- Transport, traffic, and access
- Community/Retail/Commercial
- Housing Affordability
- Natural Hazards
- Heritage and cultural effects
- Construction including earthworks
- Greenhouse gas effects
- Loss of production land

Landscape and visual amenity effects

As part of the Proposed District Plan (PDP) process, effects of urban development on Ladies Mile was assessed, as part of the Wakatipu Basin Landuse Planning Study (WBLUPS). This study was completed in March 2017 in response to a specific minute issued by the Commissioners on 1 July 2016.

In the WBLUPS, Ladies Mile was identified as Landscape Character Unit 10 and as a Ladies Mile Gateway Precinct with a 'high' absorption capacity. This was largely due to the approval of the QCC SHA. The study recommended lot sizes of 1/250m² and/or 1/450m² consistent with low and medium density subject to a 75m building setback from SH6 and providing it has an 'urban parkland' type development character.

The study concluded that a Structure Plan process will be preferred to address amenity, landscape and infrastructure issues to maximise densities of the area, and ensure that it is developed sympathetically in acknowledgement of the area being a key gateway into Queenstown. Overall, it was concluded that the Ladies Mile LCU has a high capacity to absorb increased levels of development and that it should be prioritised for development given its strategic location.

Developing densely in preferred locations with access to services and outside of outstanding natural landscapes is important to slow the spread of urban sprawl at lower densities that fails to support Public Transport. Developing in this fashion can consume highly valuable and scenic land at ever increasing rates. Employing principles geared towards Transit Orientated development in areas that are readily developable are critical to ensure that we make the best use of the land in our District.

Given the current developed state of Ladies Mile, especially on the southern side on SH6 the location of the land and the conclusions of the Wakatipu Basin Land Use planning study it is considered that the adverse effects on the landscape would be minor at worst.

Spatial Context

The Ladies Mile is directly adjacent to an existing, urbanised area, is located on key transport routes and is already serviced by public transport (which can be expanded). Walking and cycling to destinations are real options on the Ladies Mile. It is in close proximity to the major employment area of the Frankton Flats, and can be readily serviced through the financially advantageous HIF programme. It is also close to the Shotover bore field for potable water and the wastewater treatment ponds for wastewater.

The wider Lake Hayes Estate and Shotover Country areas have a current population that is larger than Arrowtown, yet there are very few facilities for the residents. Ladies Mile offers one of the few remaining opportunities to provide for some kind of community/retail space as well as green spaces, park and ride facilities, additional schools etc.

QLDC acknowledges that its thinking with regards to Ladies Mile has matured since the PDP, and it now believes that more development of the same lower density 'detached dwellings', as has been built in the surrounding area, will not be an efficient use of land and will not result in better outcomes for Ladies Mile.

In order for Flint's Park to be able to fit within this spatial context the design team looked to the QLDC Draft Spatial Plan and the Draft Master Plan that QLDC is currently undertaking.

QLDC, government and Kāi Tahu are working together in partnership to produce a joint spatial plan to address the population and visitor growth challenges facing the region. The overarching goal of the Queenstown Partnership and the Queenstown Lakes Spatial Plan is to 'Grow Well' or 'Whaiora' in Te Reo Māori which translates to "in the pursuit of wellness".

The principles that have been adopted for this project are based on the principles that underpin the Draft Queenstown Lakes Spatial Plan, Included within Appendix 3. The principles that have been adopted along with how the project aims to implement these principles are provided within the pages 7 – 11 of the attached updated Flint's Park Outline presentation.

Care has been taken to respond to the surrounding context and also to ensure that the development connects with the surrounding land rather than becoming a development island. Given the Work done by various agencies, and the careful consideration of the spatial context it is considered that there will not be any adverse effects on the Spatial context. When looking at the rapid pace of growth in Queenstown and the work that QLDC has had to undertake with regard to the NPS-UD, the development of Flints Park will have positive impact on the strategic growth of Queenstown.

Urban design and residential amenity

While Flint's Park has adopted its own design principles as previously stated these principles have been derived from the QLDC grow well principles. QLDC is currently under going a master plan over Ladies Mile that covers a larger area than just Flint's Park. The development philosophy for Flint's Park has been to develop the land in general accordance with the QLDC master Plan. The design principles that have been adopted by the master plan are set out below:

- State Highway 6 is the Gateway to Queenstown
- Unique and enduring identity
- Healthy environment
- Self sustained and connected community
- Suitable transport networks
- Do density well
- Develop a resilient and adaptable framework

The Te Pūtahi Ladies Mile - DRAFT Community Presentation 05 May 2021, has been included within Appendix 4 for further context. Flints Park has adopted a design philosophy that reflects that of the Te Pūtahi Ladies Mile Masterplan.

The Flints Park proposal is based on the premise of establishing a functioning neighbourhood with its own character and identity so that it can function effectively from day 1 – but that can integrate with and compliment surrounding development as it occurs over time. The design of Flints Park is based on a block patters that can be adapted to meet market and community demands. The neighbourhood is based around a school, and a local mixed-use centre with gardens and a green connection to the surrounding lots to the east and west of Flints Park. This design allows flexibility to respond to future demands and creates a structure that favours walking and cycling, with a high level of amenity. It is considered that the contributions that Flints Park can make to the future urban environment of Ladies Mile are positive.

Servicing and infrastructure

In 2017 and 2018 QLDC applied for HIF funding⁵ via an Indicative Business Case (IBC) and subsequent Detailed Business Case (DBC) to enable the development of key infrastructure for Ladies Mile. A Loan & Funding Agreement was signed

between The Crown and QLDC on 30 Sept 2018 for \$17.5m HIF funding, and \$6.5m NZTA funding. The QLDC share for HIF infrastructure is ~\$6m, recognising that the scope of HIF works is limited to infrastructure described within the DBC, and is based on the development of 1,100 homes. The IBC/DBC identified that the Special Housing Areas (SHA's) were the likely mechanism for commercial delivery of the proposed housing – however, HIF funding was not dependent on SHA approval. After the SHA's were denied, QLDC submitted a request to The Crown that HIF 'funding' should still be made available if QLDC could enable the delivery of housing via another mechanism (i.e. The Masterplan). The Crown agreed, and a revised programme schedule was agreed, and appended to the existing Loan & Funding Agreement on 12 Nov 2019.

An infrastructure Report was prepared for Flint's Park and has been prepared and can be forwarded on under separate cover should it be required. It is considered that the development is able to be serviced and there would be no adverse effects on existing infrastructure.

Transport, traffic and access

The Ladies Mile provides the opportunity to establish dwellings at a density that can support improved community facilities and recreational areas to what will likely become the largest population centre in the Wakatipu Basin.

The challenge with this area is that it needs to be properly planned to support such a large population and also to ensure that the development supports passenger transport modal shift. It is important to note that development on the northern part of Ladies Mile will not happen overnight. There are a number of development triggers, that will happen as the area develops over the next 5 to 7 years to ensure that as the area develops infrastructure will keep up.

QLDC has partnered with Waka Kotahi and the Otago Regional Council to form the Wakatipu Way to Go: Collaborative transport partnership. The initiatives below are planned for Ladies Mile:

- Ladies Mile to Queenstown direct service will offer shorter bus travel times to Queenstown, with no transfer at the Frankton Hub, which is a severe hindrance to the uptake of bus travel. This initiative is being worked through with the ORC.
- Ladies Mile Park and Ride, is a car park and direct buses to Frankton and/or Queenstown. This facility would be aimed at those travelling from further out (Cromwell, Arrowtown, Wanaka etc). QLDC have bought land that is currently being planned to fulfil this function.
- Shotover Bridge Bus Gate, is an option being looked at which involves traffic lights to give priority to high occupancy vehicles (HOV) where lanes merge.
- Coronation Drive bus priority, Priority lane for buses entering Queenstown. 'Queue skip' will improve travel time and attractiveness of buses to encourage modal shift from single occupancy passenger vehicles to public transport.
- Preferred active travel network which has been identified and the business case showing these will be complete within weeks.

Flint's Park will continue to facilitate these objectives by providing for bus stops, reduced car parking spaces and dominance of vehicles in the public space, while also providing for public cycling and walking trails. Refer to Appendix 5.1 for a summary of the public transport connectivity. Adverse effects relating to transport will be mitigated through provision for public transport, creating well connected neighbourhoods with a mix of land uses that encourage walkability. Therefore it is considered that the adverse effects of Flint's park on transport and traffic would be minor.

In terms of connectivity through out the norther side of Ladies Mile it is feasible to form a paper road that runs along the base of slope hill. This road connection could facilitate alternative modes for transport and the applicant is in discussions with providers that would be able to assist in the provision of alternative modes of transport.

Community/Retail/Commercial

The Ladies Mile provides the opportunity to establish dwellings at a density that can support improved community facilities and recreational areas to what will likely become the largest population centre in the Wakatipu Basin.

Flint's Park proposes to leave the existing gardens of the homestead as an established open space recreation area, with the possibility of using the homestead for community/commercial purposes. It is critical to note that increasing the level of self-sufficiency of Ladies Mile is critical to reducing private car movements.

Commercial and employment opportunities in Ladies Mile would increase the self-sufficiency of the development, which is good from a traffic point of view as would reduce the requirement for journeys to Frankton or Queenstown, and increase walking trips within the development. The proposed Mixed Use Precinct proposes development of this area as a mixed use, which also provides an opportunity to try and reduce vehicle movements to the Frankton Flats by providing for an area that enables convenience retail, food and beverage, as well as office and business services in the heart of the Ladies Mile.

Flint's Park has also made specific provision for a school site, and also a day-care facility. Over all it is considered that the provision of commercial retail and educational facilities adding to the urban infrastructure in Ladies Mile close to a community at Shotover Country that already requires these facilities is a positive contribution.

Given the scale of what is proposed from a commercial centre point of view it is not expected that there will be adverse effects on other centres like Frankton or Queenstown.

Housing Affordability

The Queenstown Lakes District is well known for a lack of affordable housing for both buyers and renters. The shortage of housing stock and resultant high purchase and rental costs has been an ongoing concern for the community for decades.

In 2017 QLDC established the Mayoral Housing Affordability Taskforce. In a report that was produced by the task force it was noted that, there is need for both scale and innovation if the district is to address what the report highlights as 'potentially the greatest challenge our District faces'.

Over this time, the Wakatipu land development market has been characterised by relatively few large-scale players, which has both limited the number of new sections that can be released and the price competition. The recommendations from the Task force that are relevant to the development at Flint's Park are:

- Build a range of affordable market offerings
- Provide more land, intensification

The development pattern proposed within Flint's Park supports a range of compact housing types that can easily be customized and adapted relatively easily – resulting in a wide range of housing typologies and price points. This breadth of range and

customization helps ensure wide 'market spread' needed to support a complete and diverse community. The high level of amenity within the development supports more intensive housing types such as terraced houses and apartments. Generally speaking, the development overall is inherently 'affordable by design'. This along with the location and nature of the site mean that the scale of development not only with Flints Park but ultimately also that in Ladies Mile mean that there is a large tract of land that will be developed and could make a reasonable impact on increasing on the supply of housing in Queenstown.

The proposal is in a unique position to be able to comprehensively plan and deliver a large number of dwellings and mixed use development to the market. As discussed above, existing developed land is not sufficient to meet demand and thus has not translated to affordability as demonstrated by the escalation of housing prices in the district. Part of the solution to affordability is the provision of additional supply. Delaying development until existing zoned areas (for example, Kelvin Heights Lower Density Suburban Residential Zone or the Remarkables Park Special Zone) are developed means that affordability is unlikely to be improved.

QLDC have recognised this, and have undertaken a master planning exercise over the land where Flint's Park is located to maximise the potential to provide dwellings on Ladies Mile. Developing Flints Park quickly through a comprehensive design process is considered beneficial to addressing the affordability challenges facing the district.

Given the design of Flints Park and location of the site on flat, sunny and serviceable land that would not cost as much to develop as steep rocky land as is present in much of Queenstown, it is considered that there will be positive effects that flow from the proposal to housing affordability.

Natural Hazards

A preliminary geotechnical evaluation has been undertaken to better understand the risks from natural hazards that exist over the site.

The conclusion of the geotechnical evaluation is that, construction of Flint's Park is considered technically feasible. Developments have been readily achieved in similar ground conditions across the Shotover, Lake Hayes and Frankton Areas. It is considered that the development is feasible and that there are no risks from natural hazards that can not be mitigated and therefore it is considered that the adverse effects from natural hazards will be less than minor.

Heritage and cultural effects

It is proposed to undertake an addition to the existing homestead, which is consented via resource consent from QLDC, for the adaptive reuse of the building as a café and gallery. Further to this Robin Miller from Origin Consultants Ltd has prepared a heritage report that relates to development on Ladies Mile as part of the work that has been undertaken for the Ladies Mile Master Plan stating:

"to retain its monetary and heritage values and ensure its future survival, the need for its adaptive reuse must be considered. This is similar to what has occurred within the district at Ayrburn Farm. Its best heritage-conservation outcome for the future may derive from its heritage-sensitive change of use and development to a valued building/site (and other utilitarian buildings) that provides a key service to the mixed-use development. The homestead's heritage values may be best retained by change of use to a heritage-focused community facility, such as a restaurant and local retail complex. The options for change should be weighed against the outcomes they present to retain the

heritage values of this building including its materials, design authenticity, and setting."

It is a positive outcome, to provide an ongoing adaptive use of the existing homestead, so that it can be "self sustaining" and protected for the future, as well as being used and appreciated by the wider public. While the adaptive use will require some minor modifications to the homestead, they will be minor and respectful of the original heritage, and so the adverse effects relating to heritage on the site would be less than minor.

Construction including earthworks

Construction and earthworks effects will be temporary, however given the scale and nature of the development these effects will need to be appropriately managed. Any further applications will include draft construction a draft environmental management plans and draft environmental management plans to manage sediment and runoff.

Earthworks will be required to control stormwater. This application would also include obtaining consent from the Otago Regional Council for urban earthworks, it is considered that the adverse effects that could arise from the proposed earthworks would be managed on site. Therefore, it is considered that the adverse effects that could arise from construction would be less than minor.

Greenhouse gas effects

With regard to environmental effects, the Act specifically requires consideration of greenhouse gas emissions. It has been estimated that buildings are directly and indirectly responsible for up to 20% of New Zealand's greenhouse gas emissions (source: www.branz.co.nz). With this in mind the development will incorporate high levels of insulation, integrating renewable energy systems and consider innovative green building designs were appropriate. Further, there is limited flat land with good solar access in Queenstown, however the subject site has good solar access, minimising the energy needs for residence. There will also be good provision for enabling public and active transport options.

Given that traffic is one of the major contributor to emissions and greenhouse gasses, the most important aspect that this proposal can provide in in responding to this challenge is to support modal shift particularly towards walking and cycling. This is principally achieved by having highly connected and legible urban form coupled with expansive greenway routes that link (or will link in future) to surrounding development areas and proposed bus route / stops. To support this, every effort is being made to reduce the provision for, and impacts of, motor vehicles and streetscape. This includes more pedestrian centric design and use of rear service lanes.

The other key response is the range of buildings typologies and associated construction techniques. Every effort has been made to optimise the use of compact, attached house forms which inherently use less materials and have less embodied energy than larger free-standing dwellings. Along with is they will achieve high levels of thermal performance and solar access which reduces energy consumption. Collectively these elements deliver a meaningful response to emissions and greenhouse gasses.

The applicant has also demonstrated that an existing 10m unformed legal road corridor passes along the northern edge of the site that links from Lower Shotover Road, past the site and could link with SH6 opposite Howards Drive.

A minimum road would include a 6.5m sealed carriageway with additional unsealed shoulders. With appropriately designed drainage facilities this road

type can be established within the existing 10m minimum width legal road corridor. This road type could serve 150 dwelling units or a traffic flow of 1000vpd. This road could facilitate alternative transport options that could provide for improved future options to address the challenge of urban transport.

For all these reasons, the adverse effects on greenhouse gas emissions are no more than minor.

Loss of production land

The site is zoned Rural General in the Operative District Plan and both Rural Lifestyle and Rural in the Proposed District Plan, with the proposed development predominantly being on the Rural Lifestyle portion of the site. The zoning of the site is currently undergoing further change. QLDC has recently released its Spatial Plan which has been prepared to be consistent with the direction of the NPS-UD (2020) to provide sufficient development capacity and achieve well-functioning urban environments.

Further to this, the site, which is part of the wider Ladies Mile area undergoing a master planning process will then undergo a further Council-led plan change. This proposal is generally consistent with that master planning process, and can be supported through any plan change process that is advanced later.

It is also noted that, as part of the Proposed District Plan hearings, the commissioners commented that Ladies Mile is best suited to urban development, but it was not within the scope of the proposed district plan at the time to rezone the land to urban so it was rezoned to rural lifestyle. As such it is widely accepted that this land will not remain rural or used for primary production.

Accordingly, the effects of loss of production land are less than minor.

Conclusion in respect of effects: no more than minor

While it is acknowledged that there will be a change in the environment as a result of the project, it is considered that the change alone does not constitute an adverse effect. Therefore, with respect to the assessment above, the first gateway test for a non-complying activity required under section 104D(1)(a) has been met in that the application will not have an adverse effect on the environment which is more than minor.

Policies and Objectives

The following Council policies, strategies and bylaws were considered:

- The Operative District Plan;
- The Proposed District Plan;
- GROW WELL | WHAIORA - Spatial Plan;
- Te Pūhaki Ladies Mile Masterplan;
- Lead Policy for SHAs;
- Housing Our People in our Environment Strategy;
- Economic Development Strategy;
- Annual Plan and the Long Term Plan.

This assessment focuses on the Objectives and Policies that are contained within the district plan. While the policies under the QLDC Operative District Plan have some relevance the Proposed District Plan (PDP) are of greater relevance, given their recency and progress through

the process, and, as such, the focus for this overall assessment of the District Plan Objectives and Policies will focus on the policies and objectives from the PDP.

Under the PDP, the land along Ladies Mile has been zoned a mixture of Large Lot Residential A, Rural Lifestyle, Rural and Wakatipu Basin Rural Amenity Zone which will allow limited further development at a range of densities (enabling 119 dwellings) but will not significantly affect housing supply or progress the integration of community facilities, transport and housing for the area.

The PDP for Ladies Mile is currently under appeal, however the appeals do not provide scope to affect significant changes across the Ladies Mile area. In other words, the latest “decisions version” of the provisions can largely be relied on.

The chapters of the PDP that have relevant Objectives and Policies are listed below:

- Chapter 3 Strategic Direction
- Chapter 4 Urban Development
- Chapter 6 Landscapes – Rural Character
- Chapter 21 Rural Zone
- Chapter 22 Rural Lifestyle Zone
- Chapter 25 Earthworks
- Chapter 26 Historic Heritage
- Chapter 27 Subdivision and Development
- Chapter 29 Transport

Chapter 3 Strategic Direction

Strategic Objectives

3.2.1 The development of a prosperous, resilient and equitable economy in the District

The proposal is not considered to detract from the Queenstown town centre and will thus maintain the town centre as a hub for New Zealand’s premier alpine visitor resort. The proposal provides for diversification of the district’s economic base and the creation of employment opportunities. It is considered that the proposal is supported by this objective.

3.2.2 Urban growth is managed in a strategic and integrated manner.

The proposal will promote a well designed and integrated urban form that connects into existing and proposed infrastructure that ensures a mix of dwelling types and land uses. Flint’s Park is located within Ladies Mile that is adjacent to one of the largest concentrated urban populations in Queenstown. Given its location, serviceability and aspect, it is considered to be strategically one of the most important areas for development in Queenstown. To this end QLDC is preparing a Master Plan that will allow for the integrated development of Ladies Mile. The strategic context has been further assessed above and it is considered that the proposal is supported by to this objective.

3.2.3 A quality built environment taking into account the character of individual communities

Flint’s Park has been designed to be generally in accordance with the QLDC Masterplan for Ladies Mile and it is considered that the proposal is supported by to this objective.

3.2.4 *The distinctive natural environments and ecosystems of the District are protected.*

Not applicable

3.2.5 *The retention of the District's distinctive landscapes.*

As outlined above, the Wakatipu Landscape study has found the Ladies Mile has a high capacity to absorb development within an area that is rapidly urbanising. The proposal does not intend to put intensive development up on Slope Hill which is an important part of the landscape, and any development along the foot of Slope Hill will be sensitive to the landscape values. It is considered that the proposal is supported by this objective.

3.2.6 *The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.*

As outlined above in the assessment of effects a well functioning urban environment is at the core of the Ladies Mile masterplan and Flint's Park. It is considered that the proposal is supported by this objective.

Strategic Policies

Town Centres and other Commercial and Industrial Areas

The suite of policies under this heading largely relate to plan changes. However the intent of the policies are to ensure that existing urban centres are not disrupted and to support the role settlement commercial precincts and local shopping centres fulfil in serving local needs by enabling commercial development that is appropriately sized for that purpose. While the proposal is not for a plan change It is considered that the proposal is in accordance with the intent of this policy.

Climate Change

As outlined in the assessment of effects above the proposal is considered to encourage not only economic activity but also travel habits that can adapt to and recognise opportunities and risks associated with climate change. It is considered that the proposal is in accordance with this policy.

Urban Development

3.2.7 *Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Queenstown, Frankton, Jack's Point and Arrowtown), Wānaka and where required around other settlements.*

3.2.8 *Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs.*

3.2.9 *Locate urban development of the settlements where no UGB is provided within the land zoned for that purpose.*

The suite of strategic policies under this heading all refer to the application of Urban Growth Boundaries. These policies have been provided for in order to address Strategic Objectives **3.2.1.8, 3.2.2.1, 3.2.3.1, 3.2.5.1 and 3.2.5.2.**

Strategic Objective 3.2.1.8 - Diversification of land use in rural areas beyond traditional activities, including farming, provided that the character of rural landscapes, significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.

The subject site is not located within a rapidly urbanising area and surrounded by Slope Hill and urban development. These areas being Shotover Country, Threpwood, Bridesdale, Lake Hayes Estate, Queenstown Country Club and Lake Hayes Estate.

Strategic Objective 3.2.2.1 - Urban development occurs in a logical manner so as to:

- a) promote a compact, well designed and integrated urban form;*

The proposal is considered to provide for a well-designed and integrated urban form. Overall Ladies Mile is sandwiched on the only bit of flat land left between the Kawarau River and Slope Hill. The lower River Flats and the upper terrace South of SH6 have been developed into an urban environment.

Developing on Ladies Mile is an opportunity to make the most of the opportunity to deliver highly efficient land use that will integrate into the development that already exists in the locality. Flints park is intended be developed in general accordance with QLDC's Ladies Mile masterplan which acts as a mechanism to manage development while supporting holistic and integrated future growth.

It is considered that the proposal is supported by this strategic objective.

- b) build on historical urban settlement patterns;*

Part of the proposal will be to build on and enhance the functions of the old homestead that is located on the site. Ladies Mile area did historically have pockets of development like for instance around the old ferry where the old Ferry Hotel used to be located. However, in recent years subdivisions Like Shotover Country, Bridesdale Farm, and the Queenstown Country Club have changed the character of the area to suburban neighbourhoods. Flints Park will not lead the way that development has historically occurred within these neighbourhoods but will build on this by providing further opportunities for education, community and recreational activities where a demand has been created by the existing suburban neighbourhoods in the locality. It is considered that the proposal is supported by this strategic objective.

- c) achieve a built environment that provides desirable, healthy and safe places to live, work and play;*

Given that Flint's Park proposes an integrated urban designed neighbourhood that will cater for the local needs of residents in a high quality environment it is considered that the proposal supported by this strategic objective.

- d) minimise the natural hazard risk, taking into account the predicted effects of climate change;*

It has been shown that the risks from natural hazards can effectively be mitigated, and it is considered that the proposal is supported by this strategic objective.

- e) protect the District's rural landscapes from sporadic and sprawling urban development;*

Ladies Mile is within an area that has been developing over time and is not considered to be out of sequence, with infrastructure readily available. QLDC has recognised this and has commenced preparing a masterplan to allow for the integrated

development of Ladies Mile and consequently Flints Park. QLDC has also prepared a Spatial Plan that is intended to enable quality built environments, while avoiding unnecessary urban sprawl.

The Spatial Plan has identified a number of ways that development could occur in the future and Ladies Mile (and consequently Flints Park) is identified as an urban centre under all scenarios.

It is considered that the proposal is supported by this strategic objective.

- f) ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in;*

The Urban design philosophy has been outlined above and it is considered that the proposal is supported by this strategic objective.

- g) contain a high quality network of open spaces and community facilities; and.*

Flint's Park has adopted an open space strategy that reflects that of the Ladies Mile masterplan which has a key objective of providing for well connected open spaces and community facilities. This proposal will provide for education opportunities, and community activities within the historic buildings. Consent has already been granted for a small art gallery.

it is considered that the proposal is supported by this strategic objective

- h) be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure. (also elaborates on S.O. 3.2.3, 3.2.5 and 3.2.6 following)*

As discussed above Flint's Park will integrate with existing urban infrastructure and funding has already been secured to upgrade any infrastructure that may already require upgrading.

it is considered that the proposal is supported by this strategic objective.

Strategic Objective 3.2.3.1 The District's important historic heritage values are protected by ensuring development is sympathetic to those values.

As discussed in the assessment of effects above the proposed development will be sympathetic to the historic heritage of the area, and it is considered that the proposal is supported by this strategic objective.

Strategic Objective 3.2.5.1 - The landscape and visual amenity values and the natural character of Outstanding Natural Landscapes and Outstanding Natural Features are protected from adverse effects of subdivision, use and development that are more than minor and/or not temporary in duration.

Strategic Objective 3.2.5.2 - The rural character and visual amenity values in identified Rural Character Landscapes are maintained or enhanced by directing new subdivision, use or development to occur in those areas that have the potential to absorb change without materially detracting from those values.

As discussed above the landscape is capable of absorbing the development, QLDC is preparing a masterplan over Ladies Mile that will further urbanise Ladies Mile, it is considered that the proposal is supported by this objective.

As can be seen through an assessment of the strategic objectives that relate to the strategic policies under Urban Development the proposal is not contrary to these strategic objectives; in fact it is largely supported by those objectives and/or will achieve them. It is therefore considered that the proposal is not contrary to the intent of the strategic policies relating to urban development.

Heritage

Heritage items will be protected from inappropriate development, and it is considered that the proposal is supported by strategic policy.

Natural Environment

The site does not contain any significant natural areas, and therefore it is considered that the proposal is supported by this strategic policy.

Rural Activities

Ladies Mile is in an area that has urbanised over the past decade and rural activities, tourist activities that rely on the rural resource area, and rural living opportunities have been provided for in other parts of the district that is less urbanised. This proposal would not subtract land that would be appropriate for rural activities from the rural land resource in the district. Therefore, it is considered that the proposal is supported by this strategic policy.

Landscapes

As discussed above the Landscape in Ladies Mile is able to absorb change and limit the extent of any change so that landscape character and visual amenity values are not materially degraded. Flints Park is in an area that has rapidly urbanised and it is considered that the proposal is supported by this strategic policy.

Cultural environment

The application avoids development that would have an adverse effect on the cultural environment. Therefore, it is considered that the proposal is supported by this strategic policy.

Chapter 4 - Urban Development

The Objectives and Policies are listed below:

4.2.1 *Objective - Urban Growth Boundaries used as a tool to manage the growth of urban areas within distinct and defensible urban edges.*

4.2.2 *Objective - A compact, integrated and well designed urban form within the Urban Growth Boundaries that*

Objective - Urban development within Urban Growth Boundaries that maintains and enhances the environment and rural amenity and protects Outstanding Natural Landscapes and Outstanding Natural Features, and areas supporting significant indigenous flora and fauna

4.2.2.13 Define the Urban Growth Boundaries for the balance of the Wakatipu Basin, as shown on the District Plan web mapping application that: are based on existing urbanised areas; identify sufficient areas of urban development and the potential intensification of existing urban areas to provide for predicted visitor and resident population increases over the planning period; enable the logical and sequenced provision

of infrastructure to and community facilities in new areas of urban development; protect the values of Outstanding Natural Features and Outstanding Natural Landscapes; avoid sprawling and sporadic urban development across the rural areas of the Wakatipu Basin.

The Urban Growth Boundary has been discussed above and as can be seen from the objectives the Urban growth boundary is intended to be a tool that can be used to manage growth in a controlled manner. The suite of policies all point to developing well-functioning urban environments that respond to growth and avoid sensitive areas (cultural, historic, hazardous, or areas of landscape significance), and sprawl.

The policies also focus on the provision of sequenced infrastructure and community facilities. While the proposed development is located adjoining to Urban Growth boundary it is considered that the proposed development is not contrary to the intent of the policies. It is noted that the Urban Growth Boundary has already been proposed to be expanded as part of the future development and will expand when the Ladies Mile Masterplan. Flints Park is already connected to Council's town water supply.

Chapter 6 Landscapes – Rural Character

The relevant Policies are contained under a number of headings:

Managing Activities in the Rural Zone, the Gibbston Character Zone, the Rural Residential Zone and the Rural Lifestyle Zone
Managing Activities in Rural Character Landscapes

As discussed above the landscape effects have been considered and QLDC is undertaking a master plan over Ladies Mile this proposal will be undertaken in general accordance with the master plan, and is therefore considered to generally not be contrary to these policies.

4.2.3 6.3.4 *Avoid urban development and subdivision to urban densities in the rural zones. (3.2.2.1, 3.2.5.1, 3.2.5.2, 3.3.13-15, 3.3.23, 3.3.30, 3.3.32).*

On the face of this policy, it might at first look appear as if the proposal should be avoided – given its the current zoning. However, the Chapter 3 Strategic Objectives that this policy implements are not so absolute; and as the analysis above demonstrated, the proposal gives effect to (and is certainly not contrary to those Strategic Objectives). Furthermore, the intent of the Policy 56.3.4 needs to be considered. Here, the land has long been identified for urban development, and is on the pathway to urban zoning through the Master Plan, and other initiatives.

Accordingly, while on a superficial look, the proposal might seem contrary to Policy 6.3.4 it is not in fact “repugnant” to it. Furthermore, even if the proposal were considered contrary to Policy 6.3.4, that does not mean that the proposal fails to meet the objectives and policies gateway test; as that test requires consideration of the objectives and policies as a whole. The above, and below, analysis demonstrates that the Proposal is not contrary to the objectives and policies in that sense.

Chapter 21 - Rural Zone; Chapter 22 - Rural Residential and Rural Lifestyle

The relevant objectives are listed below:

4.2.4 *Objective - A range of land uses, including farming and established activities, are enabled while protecting, maintaining and enhancing landscape, ecosystem services, nature conservation and rural amenity values.*

- 4.2.5 *Objective - The life supporting capacity of soils is sustained*
- 4.2.6 *Objective - The life supporting capacity of water is safeguarded through the integrated management of the effects of activities.*
- 4.2.7 *Objective - Situations where sensitive activities conflict with existing and anticipated activities are managed to minimise conflict between incompatible land uses.*
- 4.2.8 *Objective - Subdivision, use and development in areas that are unsuitable due to identified constraints not addressed by other provisions of this Plan, is avoided, or the effects of those constraints are remedied or mitigated.*
- 5.2.1 *Objective - The District's landscape quality, character and amenity values are maintained and enhanced while enabling rural living opportunities in areas that can absorb development*
- 5.2.2 *Objective - The predominant land uses within the Rural Residential and Rural Lifestyle Zones are rural and residential activities.*
- 5.2.3 *Objective - New development does not exceed available capacities for servicing and infrastructure.*
- 5.2.4 *Objective - Sensitive activities conflicting with existing and anticipated rural activities are managed.*

As discussed above the Flints Park is located within Ladies Mile, an area that is rapidly urbanising and has been identified in QLDC's Spatial Plan as a future priority growth area and is currently undergoing a master plan process.

Given the urban nature of the surrounding land use it is considered that further urbanising would not cause sensitive activities to conflict and there are little to no constraints to urban development. It is considered that given the nature of the land that Urban uses are most appropriate. This development is not being proposed on quality productive land so that resource is not being placed under further pressure due to this development.

The development is able to be serviced and, and given the nature of the surrounding urbanised neighbourhoods will be providing for development that is in keeping with the locality.

Chapter 25 Earthworks, Chapter 26 Historic Heritage, Chapter 27 Subdivision and Development, Chapter 29 Transport

The remaining chapters relate to development that in this instance is being proposed on a greenfield site, with few constraints. This means that all constraints can be designed around and adverse effects can be mitigated to ensure that the development will not be contrary to the policies and objectives that are set out in these chapters.

It is considered that the proposed development on balance to be supported by the policies and objectives that relate to these chapters.

Conclusion in respect of "not contrary" to objectives and policies, and gateway tests

With respect to the second gateway test under section 104D(1)(b), the application is not contrary to the relevant policies and objectives of the Operative District Plan or the Proposed District when considered as a whole (as is required).

Accordingly, the application passes both of the gateway tests in s104D, and consent can be granted for this non-complying activity.

Please note that the assessment and analysis above is based on a number of reports that have been prepared over the last four to five years that relate to QLDC's policies and the SHA process that has previously been undertaken over the site. These can be sent to you under separate cover should you wish to receive further detail.

5. *Whether additional consents will be required under the National Environmental Standards for Assessing and Managing Contaminants in Soils to Protect Human Health and the National Policy Statement for Freshwater Management?*

For clarity we are applying for consent under the NES for assessing and managing contaminants on site.

An application for urban earthworks will need to be lodged with the Otago regional Council, however the development will not affect freshwater and freshwater ecosystems. However out of an abundance of caution we will seek consent under the NPS for Freshwater management.

6. *How the Project will enable the upgrade and uptake of public transport*

QLDC is currently undertaking a master planning exercise that will look at how Ladies Mile will be developed in the future. A large part of this work is looking at the public transport options for the area east of the Shotover River. Flints Park is closely aligned with the QLDC Masterplan and will help integrate public transport solutions into the design of the project.

As outlined above, the Flints Park concept is in alignment with the Te Pūhahi Ladies Mile Masterplan and underlying Framework Plans. In essence, the proposal represents the first stage the masterplanned (by Council) area.

Furthermore, having a dedicated SH6 access along with the ability to construct a dedicated entry (using an existing paper road route) from Lower Shotover Road supports a number of potential bus routes as early as possible in the development of the site. The probable bus stops are legible and safe within short walkable distances from anywhere within the neighborhood.

The development pattern is simple and robust, meaning it is future-proofed for change including the ability to accommodate new opportunities (ie driverless, autonomous vehicles) with ease.

Modal shift is enhanced by reducing the general physical and visual impact of motor vehicles, elevating streetscape and pedestrian and cycle amenity along with providing for public transport early. These elements are central to the notion of self-sustaining, resilient communities capable of accommodating further growth and change over time.

Jason Bartlett of Bartlett Consulting has also prepared a number of memos. These have been included within this response. The first memo (Appendix 5.1) outlines a public transport strategy and foot path connections that would be made available that would connect Flints Park to future bus routes.

The other memo (Appendix 5.2) identifies a paper road corridor that could be formed that would join Flint's Park to Lower Shotover Road. This connection would allow for alternative modes or routes to be explored.

The approach that we have adopted in terms of our public transport philosophy is to see change from the current level of motor vehicle dependency. This change would be achieved in order of priority:

- Change – alternate fuels or electric vehicles
- Avoid travel – encourage and support work from home

- Shift – mode options: electric shuttles, e-bikes and bikes, e-scooters, walk.

7. The number and types and lots to be created by the proposed subdivision and staging

As illustrated on the Concept Plan, the residential area and the Local Centre currently is proposed to deliver 179 dwellings over 91 lots with the following typology allocations:

In an alternative scenario should it be that the school site is not developed for a school this area would also become a residential neighbourhood. This area would contain 384 dwellings. Therefore, it is requested that the proposal make allowance for up to 384 residential units. The tables below illustrate the two scenarios.

Table A – Typology Distribution with School

Typology	Number	% of Total
Multi-level Apartment	24	13%
Micro-Apartments (2 level only)	40	22%
Loft -Apartments	3	2%
Dual-key Townhouses	26	15%
Terrace Houses	31	17%
Semi-detached / Zero-Lot Housing	28	16%
Local Centre Mixed Use Apartments	27	15%
	179	

Table B – Typology Distribution without School and Optimised Local Centre

Typology	Number	% of Total
Multi-level Apartment	44	11%
Micro-Apartments (2 level only)	52	14%
Loft -Apartments	8	2%
Dual-key Townhouses	44	11%
Terrace Houses	65	17%
Semi-detached / Zero-Lot Housing	71	18%
Local Centre Mixed Use Apartments	100	26%
	384	

Please refer to the memo prepared by Weir and Associates, and the attached plans.

If you have any further questions or would like me to clarify any of the above, please do not hesitate to get in touch.

WERNER MURRAY



Senior Planner

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