

WINTON

18 August 2020

Hon. David Parker
Minister for the Environment
Private Bag 18041
Parliament Buildings,
Wellington 6160

Via Email: s 9(2)(a)

Dear Sir,

**Winton Property Limited: Lakes District Housing Retirement Housing Expansion Proposal
Request for Further Information**

Further to your letter dated 05 August 2020 requesting further information in respect to Northbrook Wanaka and Northbrook Arrowtown, I respond as follows:

Northbrook Wanaka

Question 1: Will the whole project be bundled as a non-complying activity? How do you consider that the applications will get through the gateway tests in s104D of the RMA?

Comment: The project will be bundled as a non-complying activity. A suite of technical assessments have been prepared in support of the application and have assessed the respective environmental effects of the proposal. Table A (attached) summarises the conclusions of each of the technical assessments. Overall, the effects of the proposal have been assessed as being no more than minor, meaning the application passes the first s104 gateway test (s104D(1)(a)).

An assessment of the application against the relevant objectives and policies of the Operative and Proposed Queenstown Lakes District Plans has been undertaken by Brown & Company Planning Group (having regard to the specialist reports prepared by independent experts). The conclusion of that assessment is that the proposal is not contrary to the objectives and policies of the relevant plans, meaning the application passes the second s104 gateway test (s104D(1)(b)). A copy of the assessment, which comprises approximately 87 pages of detailed Table format analysis, is available upon request.

Question 2: What erosion and sedimentation control measures will you employ onsite?

Comment: A draft Construction Management Plan ("CMP") has been prepared to address the potential effects which may arise from the construction of the proposed development. The CMP provides the framework under which construction activities will be managed to mitigate the actual and potential effects of construction. In addition to the management of construction effects (e.g. construction hours and noise, vehicle management, archaeological protocols and health and safety), the CMP contains a draft Earthworks Management Plan which sets out a

range of erosion and sediment control measures, to ensure that any significant adverse effects on people, property, public or the environment are avoided. These measures include:

- Runoff diversion channels or bunds;
- Silt fences and super silt fences;
- Re-grassing, erosion matting, and planting;
- Construction staging and sequencing to minimise erosion and sedimentation;
- Controls around storage areas for materials, plant and machinery; and
- Ongoing and regular monitoring and reporting measures.

Proposed conditions of consent include the approval (by the Council) and implementation (by Winton) of a final Earthworks Management Plan, incorporating a detailed Erosion Sediment Management Plan. All works will be carried out by experienced contractors who are proficient in carrying out bulk earthworks in compliance with all necessary environmental and regulatory requirements.

Question 3: Please provide sufficient information to substantiate the conclusions on the significance of the effects on the following:

- **Less than minor effect from the construction phase, especially given the scale and timeframes of this part.**
- **No adverse effect on the council's reticulated services.**

Comment: The effects of **construction** (both in terms of the management of earthworks and the effects on the existing residential neighbourhood e.g. noise and construction traffic) have been considered by the draft CMP, which will be implemented through conditions of consent. The construction of the development will be staged with construction effects comparable to other residential developments of this nature and scale. Further details are set out in Table A and within the draft CMP (attached).

An Infrastructure Report prepared by Paterson Pitts Group has been prepared in support of the application and addresses the effects of the development on **council's reticulated services** (specifically wastewater and water infrastructure). In respect to wastewater, the report concludes that the increase in peak wastewater flows created by the development does not trigger the need for upgrade works to the wastewater mains in either Outlet Road or Aubrey Road, nor is it likely to affect the scale of upgrades already programmed by Council in Aubrey Road. In respect to water, the report concludes that there is sufficient capacity within the existing network to supply the development as proposed. Further details are set out in Table A and within the draft Infrastructure Report (attached).

Question 4: Confirm if the job numbers provided are full time equivalents and the number of jobs that you anticipate could be filled by works that have not previously been in construction.

Comment: The job numbers provided in the application are full time equivalents (FTE's), noting that the employment numbers in the Economic Effects Assessment are reported using MEC (Modified Employment Count). The MEC is an updated version of Statistics NZ EC measure (Employment Count) and is a representation of FTE's. Within the construction industry generally, approximately 30% of positions can be filled by those workers with limited skills.

Whether these positions will all be filled by unskilled workers will depend on various market factors at the time. As set out in the application, Winton's Construction Accord provides amongst other things, training for workers looking to be re-deployed into the construction industry, 25% of low skilled positions to be filled by currently unemployed workers and the requirement for the living wage to be paid to all workers.

Northbrook Arrowtown

Question 1: Will the whole project be bundled as a non-complying activity? How do you consider that the applications will get through the gateway tests in s104D of the RMA?

Comment: The project will be bundled as a non-complying activity. A suite of technical assessments have been prepared in support of the application and have assessed the respective environmental effects of the proposal. Table B (attached) summarises the conclusions of each of the technical assessments. Overall, the effects of the proposal have been assessed as being no more than minor, meaning the application passes the first s104 gateway test (s104D(1)(a)).

An assessment of the application against the relevant objectives and policies of the Operative and Proposed Queenstown Lakes District Plans, Otago Regional Policy Statement and Otago Regional Plan has been undertaken by Brown & Company Planning Group. The conclusion of that assessment is that the proposal is not contrary to the objectives and policies of the relevant plans, meaning the application passes the second s104 gateway test (s104D(1)(b)). A copy of the assessment, which comprises approximately 102 pages of detailed Table format analysis, is available upon request.

Question 2: What erosion and sedimentation control measures will you employ on site?

Comment: A draft Construction Management Plan ("CMP") has been prepared to address the potential effects which may arise from the construction of the proposed development. The CMP provides the framework under which construction activities will be managed to mitigate the actual and potential effects of construction. In addition to the management of construction effects (e.g. construction hours and noise, vehicle management, archaeological protocols and health and safety), the CMP contains a draft Earthworks Management Plan which sets out a range of erosion and sediment control measures, to ensure that any significant adverse effects on people, property, public or the environment are avoided. These measures include:

- Runoff diversion channels or bunds;
- Silt fences and super silt fences;
- Rock check dams;
- Sediment detention ponds;
- Pipes, flumes and pumps;
- Re-grassing, erosion matting, and planting;
- Construction staging and sequencing to minimise erosion and sedimentation;
- Controls around storage areas for materials, plant and machinery; and
- Ongoing and regular monitoring and reporting measures.

Proposed conditions of consent include the approval (by the Council) and implementation (by Winton) of a final Earthworks Management Plan, incorporating a detailed Erosion Sediment

Management Plan. All works will be carried out by experienced contractors who are proficient in carrying out bulk earthworks in compliance with all necessary environmental and regulatory requirements.

Question 3: Please provide sufficient information to substantiate the conclusions on the significance of the effects on the following:

- **Less than minor effect on landscape character and amenity. No more than minor adverse effect on rural and rural-residential amenity values**
- **Less than minor effect from the construction phase, especially given the scale and timeframes of this part.**
- **No adverse effect on the council's reticulated services. Information in the PDP indicates there is no/little reticulation.**
- **No adverse effects on heritage values. Confirm whether there is a protected building on the site (PDP reference 110), and if so, what is the impact of the project on it?**

Comment: The effects of the development on **landscape character and amenity** and on **rural and rural-residential amenity values** have been assessed in the Landscape Assessment Report prepared by Patch. The retention of parts of the site (which are more sensitive to development) in their existing open pastoral or vegetated character *"will avoid and mitigate potential visual effects of the proposal and will maintain the visual amenity of the landscape, particularly from public places"*.

In respect to the effects on rural and rural-residential amenity values, the report concludes that the *"urban effects of the proposal will be well contained within a foil of vegetation and landform such that the visual and character effects of the urban area will not spread beyond the boundaries of the site such that the proposal will result in no more than low adverse effect the landscape character values of the Speargrass Flat LCU8 and will result in very low adverse effects on visual amenity"*. A copy of the draft Landscape Assessment Report is attached.

The effects of **construction** (both in terms of the management of earthworks and the effects on the existing the surrounding environment e.g. noise and construction traffic) have been considered in the draft CMP which will be implemented through conditions of consent. The construction of the development will be staged with construction effects comparable to other residential developments of this nature and scale. Further details are set out in Table B and within the draft CMP (attached).

The PDP does not contain accurate information relating to the location and capacity of reticulated services. On-site infrastructure has been recently constructed to provide for consented and development on site (including the retirement village and associated amenities). An Infrastructure Report prepared by Fluent Infrastructure Solutions has been prepared in support of the application and addresses the effects of the development on **Council's reticulated services** (specifically wastewater and water infrastructure). The Report concludes the Council's services have sufficient capacity to accommodate the development. It is noted stormwater is managed wholly on site. Further details are set out in Table B and within the draft Infrastructure Report (attached).

In respect to **heritage values**, the assessment prepared by Origin Consultants notes that while the application site includes Lots 2 – 4 DP 540788, the development associated with the proposal is contained within Lot 4, and that Lots 2 and 3 are included in the application for the purposes of landscape protection areas only. Therefore, while the application site includes the Ayrburn homestead and stone cook house (PDP reference 110) and protected trees (PDP reference's 196 and 275), no change in use or amendments are proposed to any of these features or their immediate environment as a consequence of the proposal. Further details are set out in Table B and within the draft Heritage Assessment (attached).

Question 4: We note that character and amenity values are important consideration in the appeals version of the proposed district plan (PDP). Do you consider that the project aligns with the zone objectives and policies in the PDP?

Comment: Based on the assessments undertaken by Brown & Company Planning Group and other technical experts, the project aligns with the zone objectives and policies in the PDP (specifically in respect to character and amenity values) for the following reasons:

- The site is located ~3km from Arrowtown, which is sufficiently close to Arrowtown to be able to borrow from Arrowtown's building and vegetation vernacular but sufficiently far from Arrowtown (and separated by intervening topography) that the project will not have any effects on Arrowtown's landscape and visual amenity values.
- The site adjoins two existing development areas (Millbrook and Waterfall Park) which are zoned for urban development, so the site is located in an area which anticipates and provides for urban residential development.
- The site contains 42.2ha, of which about 30ha have important landscape and visual amenity values arising from open pastoral areas visible to the passing public travelling along Arrowtown-Lake Hayes Road (which runs along the eastern boundary of the site) and Speargrass Flat Road (which runs close to the southern boundary of the site). It is proposed to protect (by way of covenant) these open, pastoral areas such that the visual amenity values associated with them are retained and protected.
- The proposed retirement village is located within the balance approximately 12ha of the site where development can be carried out with no more than low adverse effects on landscape character and visual amenity values.
- The landscape character and visual amenity values of the site derive partly from existing patterns of waterways and vegetation. Those values will be protected and enhanced by the project.
- The development includes open space and setback buffers to protect adjoining rural-residential amenity values.
- The factors detailed above all contribute to the determination of the Landscape Assessment Report that concludes *"the urban effects of the proposal will be well contained within a foil of vegetation and landform such that the visual and character effects of the urban area will not spread beyond the boundaries of the site."*

Question 4: Confirm if the job numbers provided are full time equivalents and the number of jobs that you anticipate could be filled by works that have not previously been in construction.

Comment: The job numbers provided in the application are full time equivalents (FTE's) noting the employment numbers in the Economic Effects Assessment are reported using MEC (Modified Employment Count). The MEC is an updated version of Statistics NZ EC measure (Employment Count) and is a representation of FTE's. Within the construction industry generally, approximately 30% of positions can be filled by those workers with limited skills. Whether these positions will all be filled by unskilled workers will depend on various market factors at the time.

As set out in the application, Winton's Construction Accord provides amongst other things, training for workers looking to be re-deployed into the construction industry, 25% of low skilled positions to be filled by currently unemployed workers and the requirement for the living wage to be paid to all workers.

I trust that the information contained in this letter is sufficient to enable the processing of this application through to a decision. All technical assessments referred to in this letter are available upon request. Please do not hesitate to contact me if you require anything further.

Yours sincerely



Chris Meehan

Winton Property Limited

cc. Jess Hollis, Ministry for the Environment
s 9(2)(a)

Attachments

Table A – Northbrook Wanaka Effects Assessment and Relevant Objectives and Policies
Table B – Northbrook Arrowtown Effects Assessment and Relevant Objectives and Policies
Northbrook Wanaka Draft Construction Management Plan
Northbrook Wanaka Draft Infrastructure Report
Northbrook Arrowtown Draft Landscape Assessment Report
Northbrook Arrowtown Draft Construction Management Plan
Northbrook Arrowtown Draft Infrastructure Report
Northbrook Arrowtown Draft Heritage Assessment