

# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

<b>Local authority providing comment</b>	Queenstown Lakes District Council
<b>Contact person (if follow-up is required)</b>	Tony Avery, General Manager – Planning and Development
	Click or tap here to enter text.
	Click or tap here to enter text.

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	The Yards - Resource Recovery and Service Activity Park
<b>General comment – potential benefits</b>	<p>Queenstown Lakes District Council (<b>QLDC</b>) acknowledges the social and economic costs associated with the availability and price of land for residential and business purposes. The Queenstown Lakes Proposed District Plan (<b>PDP</b>), alongside other key strategic growth documents (i.e., the Queenstown Lakes Spatial Plan) signal the current methods and future strategies intended to manage these challenges in line with those expectations of the RMA and other national directions, in particular, the National Policy Statement on Urban Development (<b>NPS UD</b>).</p> <p>The application would provide additional land for industrial and service development capacity. If the application is approved and the land made available for development, economic benefits are likely to eventuate in the form of jobs and land to accommodate future Industrial and Service activities. The economic assessment provided as part of the application suggests there is a shortfall of industrial land. Recent assessments of the ‘yard based’ part of the proposal suggests its economic benefits are likely to outweigh its economic costs.</p>
<b>General comment – significant issues</b>	<p><b>Proposed District Plan - Urban development</b></p> <p>Based on the information provided as part of the application, Council considers that the proposal comprises Urban Development on account of its overall scale and intensity which will be distinct from rural development. If the application is accepted for consideration under the fast-track process, a determination will need to be made on the question of whether or not the proposal comprises Urban Development, and an assessment will need to be made in the context of the higher order chapters of the PDP, including among others, Chapter 3 (Strategic Development), Chapter 4 (Urban Development) and Chapter 6 (Landscapes).</p> <p>This is a significant issue because the PDP does not envisage Urban Development outside of Urban Growth Boundaries (<b>UGBs</b>) or within the rural environment<sup>1</sup>.</p> <p>Chapter 2 (Definitions) of the PDP provides a definition of Urban Development:</p>

<sup>1</sup> Note that that a UGB is not present in this instance and the subject land is located within the rural environment

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*Means development which is not of a rural character and is differentiated from rural development by its scale, intensity, visual character and the dominance of built structures. Urban development may also be characterised by a reliance on reticulated services such as water supply, wastewater and stormwater and by its cumulative generation of traffic. For the avoidance of doubt, a resort development in an otherwise rural area does not constitute urban development, nor does the provision of regionally significant infrastructure within rural areas.*

The proposal is different to the purpose and character of the Rural Industrial Sub Zone, and other rural zones, on account of the limits placed on the nature and scale of activities in these locations. These limits, include, among other things, a definition for Rural Industrial Activities:

*Means the use of land and buildings for the purpose of manufacturing, fabricating, processing, packing and/or storage of goods and materials grown or sourced within the Rural Zone and the storage of goods, materials and machinery associated with commercial contracting undertaken within the Rural Zone.*

The scale of the proposal is considered significant, being some 37 Ha. The quantum of lots created, the resulting amount of built form and ancillary uses (such as storage etc) associated with each lot, and the higher density of the proposed 'storage' and 'club' area shown on the proposed 'Master Plan' is indicative of an intensity of development that is representative of Urban Development, and which is incompatible with the current mix of zoning in this area (being Gibbston Character Zone and Rural Zone).

The significant scale of the proposal, large number of lots created, and commercial nature of the activities, is likely to result in an intensity of people and traffic movements being attracted to the land akin to an urban zone.

#### **Proposed District Plan – Strategic planning matters**

Challenges associated with the availability and price of land for residential and business purposes within the District have been acknowledged above. However, QLDC's position is that the PDP currently meets the requirements of the NPS UD in regard to business development capacity. In particular, there is sufficient industrial development capacity zoned by the PDP to meet demand over the short and medium term. This position is supported by economic assessments undertaken by QLDC's economic expert in association with Stage 3 of the District Plan review which involved an interim update to the District's Business Development Capacity Assessment<sup>2</sup>. The Queenstown Lakes Spatial Plan 2021<sup>3</sup> has identified areas that will be used to deliver long term business development capacity needs. It is QLDC's position that the Spatial Plan process be allowed to play out to rationally deliver long term business development capacity in a coordinated and integrated manner.

The subject land was not identified in the Spatial Plan for that purpose (among others) and is located in a relatively remote location, particularly in comparison to the District's other centres of urban development. It is located approximately 34 km from Queenstown and 25 km from Cromwell in the Kawarau Gorge, and is therefore approximately half way between Queenstown and Cromwell.

The Victoria Flats Landfill is located to the north in close proximity to the land subject to the application. Designation 76 adjoins the subject land which provides a 'landfill buffer' for the Victoria Flats landfill. The purpose of a landfill buffer zone is to mitigate the risk of complaints from an operator's perspective. It is understood from the information provided with the application that the proposed development is located outside of the landfill buffer. However, potential reverse sensitivity effects on the landfill will still be an issue that, if the application is accepted, will need to be considered.

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<sup>2</sup> Appendix B, Interim BDCA Update Addendum, Evidence In Chief Of Natalie Dianne Hampson For Queenstown Lakes District Council NPS-UDC Capacity And Economic Matters Relating To The General Industrial And Three Parks Zones, 18 March 2020 <https://www.qldc.govt.nz/media/ec5j0umf/qldc-t17-hampson-n-evidence-economic-18-03-2020.pdf>

<sup>3</sup> <https://www.qldc.govt.nz/your-council/council-documents/queenstown-lakes-spatial-plan>

	<p><b>Traffic and access</b></p> <p>The safe and efficient management of traffic and access into the land is a significant issue. Access into the land is off State Highway 6 via Victoria Flats Road. This access situation is understood to present significant traffic safety concerns. This issue was traversed in the consideration of the applicant’s submission on Stage 3 of the PDP.</p> <p>If the application is accepted for consideration under the fast-track process, a determination will need to be made in regard to traffic and access effects, particularly in respect of the intersection with the State Highway. The proposal will need to satisfy the expectations of Chapter 27 (Subdivision and Development) and Chapter 29 (Transport) of the PDP.</p> <p><b>Landscape</b></p> <p>The management of landscape effects from the proposed development is a significant issue. Part of the land is located in a visible location on State Highway 6 that forms the entry point into Queenstown. Land within the Rural Zone is classified Outstanding Natural Landscape (ONL). Land within the Gibbston Character Zone is subject to a separate landscape management regime.</p> <p>Chapter 3 (Strategic Development) and Chapter 6 (Landscapes) set out the direction that must be achieved for developments within ONL’s – that new development within the Rural Zone is inappropriate unless the values of ONL’s are protected. The landscape outcomes anticipated within the Gibbston Character Zone are set out within the Objectives and Policies of that Zone.</p> <p>Landscape matters were traversed in the consideration of the applicant’s submission on Stage 3 of the PDP.</p> <p>If the application is accepted for consideration under the fast-track process, a determination will need to be made in regard to landscape effects. The proposal will need to satisfy the expectations of Chapter 3 (Strategic Direction), Chapter 4 (Urban Development), Chapter 6 (Landscapes) and the respective zone chapters.</p> <p><b>Viticulture and productive land</b></p> <p>Part of the subject land is located within the Gibbston Character Zone and the remaining areas are located within the Rural Zone. The Gibbston Character Zone is recognised for its soils, microclimate and availability of water which has enabled it to become an acclaimed wine producing area. The surrounding Rural Zone is intended to enable farming.</p> <p>It is understood that the unique environmental attributes of the land in this area make it suitable for productive viticultural practices. This is a significant issue that will need to be considered if the application is accepted for consideration under the fast-track process.</p> <p><b>Water, Wastewater and Stormwater management</b></p> <p>While the application states that the proposal would not be reliant on reticulated services, it does not appear that any supporting information has been provided to confirm this is this case. Further, it is noted that this location is not reticulated, and Council does not have any intentions to reticulate this location. Water quality in this location, particularly the Kawarau River is of a very high quality. Given this, these matters are a significant issue that will need to be considered if the application is accepted for consideration under the fast-track process</p>
<p><b>Is Fast-track appropriate?</b></p>	<p>For the reasons set out elsewhere in this summary, a number of significant issues are associated with the nature, scale, intensity and location of the proposed activity. The application is for a 37 Ha development that satisfies the definition of Urban Development and which is not well supported by the PDP’s higher order strategic objectives and policies.</p> <p>As such, a plan change process is considered to be the most appropriate method for determining the appropriateness of the proposed development. A plan change process would enable key strategic planning questions to be considered, which among others include determining the underlying landscape classification, the need for a UGB, and allocating the most effective and efficient zone to the land.</p>

<b>Environmental compliance history</b>	There is no known regulatory history relating to the Cardrona Cattle Company Limited.
<b>Reports and assessments normally required</b>	<p>The following assessments would normally be required by the Council for the assessment of the proposal:</p> <ul style="list-style-type: none"> <li>- Ecological</li> <li>- Viticultural</li> <li>- Geotechnical and natural hazards</li> <li>- Traffic and transport</li> <li>- Water and wastewater</li> <li>- Stormwater</li> <li>- Landscape and visual amenity</li> <li>- Construction, including earthworks</li> <li>- Contaminated land</li> </ul> <p><b>Assessment against relevant parts of the Queenstown Lakes District Plan (<a href="#">here</a>)</b></p> <ul style="list-style-type: none"> <li>- Chapter 3 – Strategic Direction</li> <li>- Chapter 4 – Urban Development</li> <li>- Chapter 6 – Landscapes</li> <li>- Chapter 21 – Rural Zone</li> <li>- Chapter 23 – Gibbston Character Zone</li> <li>- Chapter 27 – Subdivision and Development</li> <li>- Chapter 29 – Transport</li> </ul> <p><b>Assessment against other relevant statutory policy documents:</b></p> <ul style="list-style-type: none"> <li>- Resource Management Act 1991,</li> <li>- National policy statements</li> <li>- Partially Operative Otago Regional Policy Statement 2019</li> <li>- Proposed Otago Regional Policy Statement 2021</li> </ul> <p><b>Assessment against Iwi management plans</b></p> <ul style="list-style-type: none"> <li>- The Cry of the People, Te Tangi a Taurira: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008</li> <li>- Kāi Tahu ki Otago Natural Resource Management Plan 2005</li> </ul>
<b>Iwi and iwi authorities</b>	Aukaha and Te Ao Marama
<b>Relationship agreements under the RMA</b>	None applicable
<b>Insert responses to other specific requests in the Minister’s letter (if applicable)</b>	<p>In response to the specific questions raised by Stephanie Frame, Manager Fast-Track Consenting Team in the letter to Mike Theelen dated 31 August 2022:</p> <ol style="list-style-type: none"> <li>1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA? <p>Please see comments in other parts of this summary.</p> </li> <li>2. What reports and assessments would normally be required by the Council for a project of this nature in this area?</li> </ol>

	<p>Please see comments in other parts of this summary.</p> <p>3. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?</p> <p>Please see comments in other parts of this summary.</p> <p>4. Has a hearing date been scheduled for the applicant’s current resource consent application?</p> <p>A hearing is in the process of being scheduled for this resource consent in October 2022</p>
<p><b>Other considerations</b></p>	<p>The activities being sought are currently subject to separate Resource Management Act 1991 (RMA) decision making processes, including:</p> <ul style="list-style-type: none"> <li>a) A plan review process - The applicant made a submission<sup>4</sup> to apply an urban industrial zone to the land through Stage 3 of the Queenstown Lakes District Proposed District Plan (PDP) review. This submission was rejected. The appellant is proceeding with an appeal<sup>5</sup> against this decision. The appeal relief is similar to the ‘larger lot’ component of this fast-track application. An evidence exchange timetable has now been confirmed for this appeal which would see evidence exchanged between the parties during October – December 2022, with a hearing to be scheduled in early 2023.</li> <li>b) A resource consent process – The applicant is currently pursuing a version of the ‘storage component’ of the fast-track application by way of resource consent RM220327. This was a publicly notified application and a hearing is in the process of being scheduled for October 2022.</li> </ul> <p>In addition, the following resource consent applications have been processed for the site:</p> <ul style="list-style-type: none"> <li>a) Resource consent RM191130 - Cardrona Cattle Company lodged resource consent seeking to establish a 412-unit self-storage facility at 3207 Gibbston Highway, Gibbston. The facility was proposed to be situated between Victoria Flats Road and Gibbston Highway with access to be gained off Victoria Flats Road. The application was declined by an Independent Commissioner on October 5<sup>th</sup> 2020 on account of the potential for reverse sensitivity effects to cause operational restrictions on the landfill.</li> <li>b) Resource consent RM210935 - Cardrona Cattle Company lodged on behalf of BMT Contracting Limited resource consent to establish a landscaping bulk storage and supply operation with a portacom and water tank (contractor’s yard). The application was granted on 27<sup>th</sup> May 2022.</li> <li>c) Resource Consent RM200735 - Lodged on behalf of Queenstown Trail Trust Network seeking to undertake works and construct buildings in association with the construction of a walking and cycling trail at Gibbston Highway. The proposed trail location follows the eastern site boundary before turning inland to follow Victoria Flats Road, passing the site.</li> <li>d) Resource Consent RM220722 – Lodged on 17 August 2022 by Cardrona Cattle Company Ltd for Railton Contracting Limited seeking to establish a portacom building for an office and smoko room, and a yard for the storage of machinery and concrete products.</li> </ul> <p>The subject land (and surrounding area) was also the subject of a Special Housing Area proposal under the Housing Accords and Special Housing Areas Act (HASHAA). This proposal covered approximately 80 Ha of land and comprised approximately 1,500 residential units and accommodating 3,750 people. The proposal was not supported by Council and therefore was not recommended to the Minister by the Council for consideration.</p>

<sup>4</sup> Submission ref 3349

<sup>5</sup> ENV-2021-CHC-034















# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

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<b>Local authority providing comment</b>	Otago Regional Council
<b>Contact person (if follow-up is required)</b>	Joanna Gilroy
	s 9(2)(a)
	P 0800 474 082   M s 9(2)(a)

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	The Yards
<b>General comment – potential benefits</b>	No Comment. This question would best be addressed by the District Council
<b>General comment – significant issues</b>	The ORC transport team had no comments on this application.
<b>Is Fast-track appropriate?</b>	There is no reason why this application could not go through the standard RMA consent process within statutory timeframes.
<b>Environmental compliance history</b>	The ORC compliance team has reported no compliance history relating to Cardrona Cattle Company Limited
<b>Reports and assessments normally required</b>	<p>There would be a number of consents that would be required for this proposal. ORC have standard forms that need to be completed for various resource consent types and there would also need to be assessment of environmental effects provided for each consent.</p> <p>In terms of specific reports and assessments, ORC would require:</p> <p style="padding-left: 40px;">A report which addresses the following matters: (a) The location of the composting relative to any water body, areas prone to erosion, inundation or subsidence, and areas of cultural, conservation or historic significance;(b) The adverse effects on land, water and air arising from any discharges;(c) The action that is to be taken to avoid, remedy or mitigate any adverse effects of any discharges; and(d) The monitoring programme to be implemented.</p> <p style="padding-left: 40px;">This report would relate to the proposed worm farm and composting activities on the site</p> <ul style="list-style-type: none"> <li>- A storm water management report. The resource recovery park, storage of landscaping supplies and firewood processing would require</li> </ul>

	<p>management of any leachate to occur in accordance with the rules of the Regional Plan Waste for Otago and the Regional Plan Water for Otago. A stormwater management report should detail how any leachate from the materials stored on site will be managed.</p> <ul style="list-style-type: none"> <li>- A report providing the information required under regulations 62 and 63 of the National Environmental Standards for Freshwater if, as the application states, culverts are to be installed in the water race as a permitted activity under NES-FW regulation 70.</li> </ul> <p>The application notes that an alteration to water permit RM21.351.01 would be required to alter the water permit from irrigation and domestic supply to a commercial supply, specifically condition 1. This could not be processed as an alteration to a resource consent under section 127 of the RMA therefore a new consent would be required.</p>
<b>Iwi and iwi authorities</b>	Te Rūnanga o Ngāi Tahu (for notified applications only) and Aukaha and Te Ao Marama (consultancies operating on behalf of iwi).
<b>Relationship agreements under the RMA</b>	Nil
<b>Insert responses to other specific requests in the Minister's letter (if applicable)</b>	NA
<b>Other considerations</b>	<ul style="list-style-type: none"> <li>- The proposed activity involves large development and subsequent traffic movement within an Outstanding Natural Landscape (ONL) area under the QLDC's proposed district plan (Decisions version). The site is subject to an appeal over zoning. The ORC's partially operative Regional Policy Statement 2019 (poRPS 2019) polices provides a framework for managing of ONLs (Policy 3.2.4). A guide to the types of values to be managed are indicated in Schedule 3 of the poRPS 2019 which directs the criteria for identifying ONLs. The decision on the proposed activity must have regard to the poRPS 2019 framework, as well as the QLDC district plan (operative and proposed) framework.</li> <li>- There is a neighbouring, existing landfill activity (QLDC's) to the proposed development site. The decision should take into account not creating reverse sensitivity effects on the existing activity in accordance with Policy 5.3.1 (d) of the poRPS.</li> </ul>

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

# Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

*This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

<b>Organisation providing comment</b>	Transpower New Zealand Limited
<b>Contact person (if follow-up is required)</b>	Jo Mooar
	Senior Corporate Counsel
	s 9(2)(a) [REDACTED]

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	The Yards - Resource Recovery and Service Activity Park. Application number: PJ-0000802 ( <b>Project</b> )
<b>General comment</b>	<p>Transpower has been identified as an “other person” for the purpose of section 21(3) of the COVID-19 Recovery (Fast-Track Consenting) Act 2020 (<b>Act</b>). Thank you for the opportunity to provide comments about the Project, and its potential impact on the National Grid assets.</p> <p>The Cromwell to Frankton A line (including a number of support structures) traverses the southern and south-western portion of the site, as shown on the map at <b>Appendix A</b>. This line is the sole National Grid line to Queenstown, and provides the bulk of the electricity that the district relies upon. It is critical that the Grid assets are not negatively impacted by the Project, and the subsequent development. There is no ability to back-feed electricity via another means.</p> <p>The line is not designated, and Transpower relies on policies 2, 10 and 11 of the National Policy Statement on Electricity Transmission 2008 (<b>NPSET</b>) to protect the line.</p> <p>There is very little information in the application to determine whether there will be significant adverse effects on the Grid. However, there is the potential for significant adverse effects (section 19(e) of the Act) if development around the line is not appropriately designed, constructed and the ultimate land use appropriately undertaken.</p> <p>As can be seen from the map at Appendix A, the lot layout appears to have been developed without considering the location of the line – the line bisects a number of lots, and could impact on what activities could safely occur on those lots.</p> <p>Given the line traverses the site, the NPSET is relevant, and particularly policy 10. Policy 10 provides that:</p> <p style="padding-left: 40px;">“In achieving the purpose of the Act, decision-makers must to the extent reasonably possible manage activities to avoid reverse sensitivity effects on the electricity transmission network and to ensure that operation, maintenance, upgrading, and development of the electricity transmission network is not compromised.”</p> <p>However, the application does not identify the NPSET as a relevant national policy statement (see page 13 of the Application for the project to be referred to an expert consenting panel). There is very little information in the application to determine whether the application is inconsistent with the NPSET (section 23(5)(c) of the Act), and whether operation maintenance, upgrading and development of the Grid would be compromised. We are concerned that:</p> <ul style="list-style-type: none"> <li>• The lot layout indicates that buildings could be built directly under the line – the area and dimensions of a number of lots may be inadequate to facilitate the intended use and avoid buildings directly under or too close to the line. In this regard, the application</li> </ul>

	<p>states that “each contractors yard includes provision for a total building coverage of up to 600m<sup>2</sup>, and a general maximum building height of 8m with a lower height of 6m at the eastern end of the site (as shown by Lots 34-54 on the master plan). Restrictions on building development would be required for all lots traversed by the line;</p> <ul style="list-style-type: none"> <li>• Access to the Grid could be prevented, when access for emergency works is required at all times, and access for maintenance at all reasonable times. Existing access tracks appear to be cut off by the Project;</li> <li>• The intended use of the site for activities which would likely involve mobile plant, excavators, forklifts and HIABs, when there is no indication about how these activities would occur safely around the line. The application refers to activities including a “recycling center (sic), demolition yard, firewood processing, worm farm and composting facility, building materials recycling and resales yard, and a range of contracting yards for processing and storage of landscaping supplies, storage of contractors equipment and vehicles.”</li> <li>• Planting appears to be proposed close to the line, yet there is no indication that species will be chosen or located taking the line into account. Vegetation grown too close to the conductors or National Grid lines, can cause fire risk, and/or risk of falling into the line.</li> </ul> <p>The potential significant adverse effects, and potential to be inconsistent with the NPSET, could be resolved through the imposition of conditions on any consent granted – once further information is available about what is intended. These conditions could be imposed by way of consent notice, to ensure future owners of the lots were aware of the need for appropriate setbacks from the line.</p>
<b>Other considerations</b>	As above.
<b>Insert specific requests for comment</b>	Should the application be accepted for referral, Transpower seeks to be invited to comment on any consent applications that are lodged with the expert consenting panel, to ensure that the line is not compromised, and significant adverse effects do not result. The Act provides for Transpower’s continued involvement as an occupier of the land on which the Project is to be undertaken (Schedule 6, clause 17(4)(g)).

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry’s proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

# Legend

## Structure

- ☑ Double Circuit Steel Tower

## Transmission Line

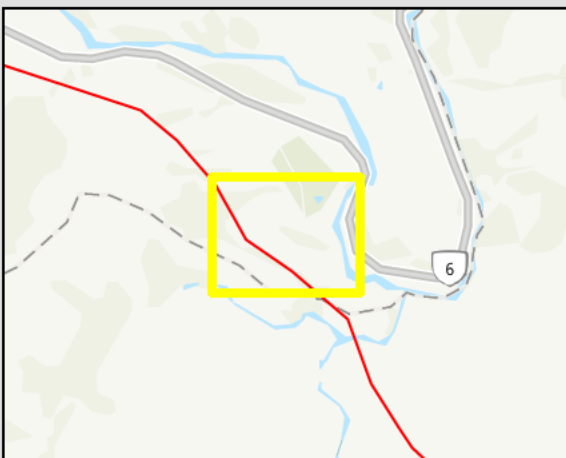
### Design Voltage

- 110 kV Overhead
- - - Access Track
- ▭ Parcel boundary



Site plan is sourced from Rough Milne Mitchell Landscape Architects Figure 1. This plan has been georeferenced and may not be to scale.

Sheet 1 of 1



**LEGEND**

- Ohiwa Character Zone
- Transpower National Grid Corridor 52m each side of lower edge. Total approx 30 metres
- Transpower National Grid Tower Base

## External

## Disclaimer

This document is produced for external release. Its conclusions are based on the information currently available to Transpower and may change as further information becomes available either internally or externally.  
CRS as per CoreLogic data supply August 2019.



Prepared by: Geospatial

# Transpower National Grid Network The Yards

0 100 200 Meters

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Date: 9/09/2022 Drawn by: aldrich

Projection: NZTM 2000 Scale: 1:4,828 Plan Size: A3L

Path: T:\GIS\Projects\22061\_CML\_FKN\_A\_Development\aprx

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*This form is for persons requested by the Minister for the Environment to provide comments on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.*

<b>Organisation providing comment</b>	NZ Transport Agency (Waka Kotahi)
<b>Contact person (if follow-up is required)</b>	Richard Shaw, Team Leader South – Poutiaki Taiao   Environmental Planning Waka Kotahi NZ Transport Agency
	Email: Environmentalplanning@nzta.govt.nz
	DDI: 03 964 2809

## Comment form

Please use the table below to comment on the application.

<b>Project name</b>	The Yards – Resource Recovery and Service Activity Park, Victoria Flat Road, Gibbston
<b>General comment</b>	<p>Waka Kotahi NZ Transport Agency (Waka Kotahi) consider themselves a key stakeholder to this project given the reliance on State Highway 6 (SH6) and the current intersection with Victoria Flats Road for access to the site.</p> <p>Waka Kotahi is <u>opposed</u> to this project being referred to the expert consenting panel under the COVID-19 Recovery (Fast Track consenting) Act 2020. Given the potential issues with the proposal identified below it is considered that it would be more appropriate for it to go through a standard Plan Change process under the RMA. The issues of concern to Waka Kotahi with the proposal that have led to this conclusion include:</p> <ul style="list-style-type: none"> <li>• The scale and location of the proposal is considered an ad hoc development out of context in the Rural Zone.</li> <li>• The site is remote from Queenstown and Cromwell; if consented it could potentially create a precedent in the area for other industrial activities. There has been no plan change approved to rezone the land and therefore the proposal lacks certainty for future internal transport networks and for the integration with the wider transport network. If approved, it would be an unanticipated development and potentially a poor planning outcome for the area.</li> <li>• The proposal includes several named activities including the resource recovery centre, demolition yard, firewood processing and storage facilities. It also includes subdivision as part of Stage 1 and 2 of the development. The intention is the lots will be sold to and used as contractors' yards. However, this is not a guaranteed outcome, and the potential is for lots being sold may be attractive to other types of land use wanting to establish in the area (e.g. recreation close to the lake area and/or residential).</li> </ul>

	<ul style="list-style-type: none"> <li>• Being a remote site with no current viable public transport options, it will generally require people to travel to access the site and for any amenities and services by private vehicles. This is not consistent with the recently released Government Emissions Reduction Plan which is seeking to reduce total kilometres travelled. It could also be inconsistent with the changes to the Resource Management Act 1991 (RMA) proposed to align the RMA with the Climate Change Response (Zero Carbon) Amendment Act 2019. The amendments, which will come into effect on 30 November 2022, allow consideration of greenhouse gas emissions in plan making and consenting decisions to align with national direction on climate change management and adaption plans.</li> <li>• The transport assessment attached to the referral application is described as a summary document. If referred to an expert consenting panel, Waka Kotahi would expect the application to include a more comprehensive transportation assessment that includes a safe system assessment identifying trigger points when the intersection of Victoria Flats Road intersection with SH6 would require upgrading and the nature of any upgrade, and any potential wider transport implications. Consideration should also be given to options for the promotion and likely take-up of public transport and active transport modes.</li> </ul> <p>If this project is referred to an expert consenting panel, we would expect the applicant to continue to consult with Waka Kotahi as part of their detailed application process. We would also expect an integrated transportation assessment to be prepared as part of the application and prior to this assessment being prepared the applicant’s transportation expert to consult with us over the scope and form that this assessment should take.</p>
<b>Other considerations</b>	
<b>[Insert specific requests for comment]</b>	That Waka Kotahi is considered a key stakeholder to this project given the potential for adverse effects on the highway network. If referred, we would ask the expert consenting panel to direct the applicant to consult with us directly prior to lodgement of their application.

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry’s proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

