

Our reference: A1433508

13th December 2021

The Chief Executive
Queenstown Lakes District Council
Private Bag 50072
Queenstown

Otago Regional Council (ORC) submission on RM200866

Applicant: Queenstown Commercial Limited

Location of Site: 466 Frankton- Ladies Mile Highway, Lake Hayes, Queenstown 9371

Brief Description of Application: Subdivision and land use consent to create 12 additional residential lots ranging in size from 518m² to 910m². Proposed Lot 6 will contain the existing residential dwelling.

Decision requested:

ORC requests this application be declined.

Reasons:

1. The proposed subdivision of land zoned rural would create a density of development that is inconsistent with the objectives and policies of the Partially Operative Otago Regional Policy Statement 2019 (RPS) , the operative district plan (ODP),the proposed district plan (PDP) and
2. If granted, this proposed development would set a precedent for future urban developments proposed in the area. The characteristics of the site are such that they could be replicated throughout the District, resulting in multiple subdivisions of urban sized lots in the rural area. This would undermine the integrity of the PDP and the OPD.
3. The site is located within the Ladies Mile Corridor between Shotover River and Lake Hayes which is an area of significance for many locals, and is often seen as a gateway into Queenstown. The density of development has the potential to undermine this amenity landscape.
4. The District is well-regarded for its natural amenity values, which contribute significantly to the District's social and economic wellbeing. The quality of the landscape, open spaces and the natural built environment is a significant contributor to these well-beings. If not appropriately managed, urban sprawl can lead to adverse effects on the character and amenity of the rural environment, and negatively impacting the impression and enjoyment of the District by residents and visitors.

Application detail:

- 1) The proposal is within the Rural General Zone of the ODP and the Rural Zone of the PDP. A small part of the site is located within the Rural Lifestyle Zone.
- 2) The site is 9503m² in area and contains an existing dwelling, with mature landscaped grounds
- 3) The proposed subdivision is a non-complying activity.
- 4) The site is located outside of the urban growth boundary.
- 5) The applicant seeks to establish a high density of residential activity within a rural zone.

ORC assessment:

- 6) ORC considers that the proposed subdivision will have adverse effects on the natural amenity of the surrounding area and will contribute to urban sprawl and disconnected urban settlements.
- 7) Section 5 of the Resource Management Act 1991 requires the sustainable management of the use and development of natural and physical resources in a way which enables people and communities to provide for their wellbeing while sustaining the potential of natural and physical resources for future generations.
- 8) The RPS, the ODP and the PDP have objectives and policies to achieve the requirements of Section 5 by providing a framework for a managed approach to urban development that utilises land and resources in an efficient manner and preserves and enhances natural amenity values, particularly those amenity values associated with the rural area.
- 9) The proposal is not in accordance with the Partially Operative Otago Regional Policy Statement 2019 and does not give effect to it. It is inconsistent with the provisions of the RPS, in particular;
 - a) Objective 4.5 *'Urban growth and development is well designed, occurs in a strategic and coordinated way, and integrates effectively with adjoining urban and rural environments'*
 - b) Policy 5.3.1 *'Manage activities in rural areas, to support the region's economy and communities, by:*
 - (d) *Restricting the establishment of incompatible activities in rural areas that are likely to lead to reverse sensitivity effects;*
 - (e) *Minimising the subdivision of productive rural land into smaller lots that may result in a loss of its productive capacity or productive efficiency;*
- 10) The proposal is not in accordance with the ODP or the PDP. It is inconsistent with the provisions of the PDP, in particular;
 - a) Objective 3.2.2 *'Urban growth is managed in a strategic and integrated manner'*
 - b) Objective 3.2.3 *'A quality built environment taking into account the character of individual communities...3.2.3.2 Built form integrates well with its surrounding urban environment'*
 - c) Policy 3.3.14 *'Apply provisions that enable urban development within the UGBs and avoid urban development outside of UGBs'*
 - d) Policy 6.3.4 *'Avoid urban development and subdivision to urban densities in the rural zones'*
- 11) It is also inconsistent with the provisions of the ODP, in particular;
 - a) 7.1.2, Policy 1.5 *'To maintain a distinction between the urban and rural areas in order to assist in protecting the quality and character of the surrounding environment and visual amenity'*
 - b) 7.1.2, Policy 2.1 *'To contain the outward spread of residential areas and to limit peripheral residential or urban expansion.'*
 - c) 7.1.2, Policy 2.3 *'To provide for rural living activity in identified localities'*

Yours sincerely



Gwyneth Elsum
General Manager Policy, Science, and Strategy