

**Queenstown Lakes District Proposed District Plan**  
**Section 32 Evaluation**  
**Stage 3 Components**

For:

**Chapter 18A – General Industrial Zone**

And consequential Variations to Proposed District Plan Chapters:

Chapter 25 – Earthworks

Chapter 27 – Subdivision and Development

Chapter 29 – Transport

Chapter – 36 Noise

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**Appendix 1:** Economic Assessment of Queenstown Lakes District’s Industrial Zones, Stage 3 of the District Plan Review, 22 May 2019, Market Economics

**Appendix 2:** Business Development Capacity Assessment 2017, Queenstown Lakes District, 15 March 2018, Market Economics

**Appendix 3:** Landscape Memo, Glenda Drive Rural General Zoning, 21 February 2019, Helen Mellsop Landscape Architect

## 1. EXECUTIVE SUMMARY

1.1. This proposal involves a review of the following three Operative District Plan (**ODP**) zones:

1. Industrial Zone
2. Industrial B Zone
3. Ballantyne Road Mixed Use Zone

1.2. Table 1 below describes the location of the ODP Industrial Zones throughout the District. No other land will be considered as part of this review.

<b>Table 1 - ODP Industrial Zones</b>	
<b>Zone</b>	<b>Location</b>
Industrial Zone	Arrowtown – Bush Creek Road Queenstown – Glenda Drive Wanaka - Ballantyne Road (western side of road)
Industrial B Zone	Wanaka - Ballantyne Road (western side of road)
Ballantyne Road Mixed Use Zone	Wanaka - Ballantyne Road (eastern side of road)

1.3. Collectively, these ODP zones (referred to hereon as '**the Industrial Zones**') manage a large proportion of the land capacity allocated principally for the establishment, operation and growth of industrial type activities. However, the way in which these Industrial Zones manage activities and development is somewhat disparate. This has increased complexity for plan users and administrators, and produced uneven land use outcomes between the different Industrial Zones. Collectively, the Industrial Zones provisions have not sufficiently recognised or provided for those land use characteristics which enable the long term viability of industrial type activities, and have inadvertently provided for non-industrial type land uses to establish and operate within the Industrial Zones, such as Office, Retail and Commercial activities, which have contributed to industrial development capacity restraints within the District.

1.4. The Industrial Zones have been used as a baseline for this review, and the key changes that are recommended are as follows:

- a) Replace the existing Industrial Zones with a single zone framework referred to as the 'General Industrial Zone' (the **GIZ**);
- b) Exclude and restrict non-industrial type activities from the GIZ, including for the principle use of Office, Retail, Commercial and other related non-industrial type activities;
- c) Enable ancillary non-industrial type activities, including Office, Retail and Commercial activities, and food and beverage related commercial activities to the extent that they directly relate to and support Industrial or Service Activities;

- d) Identify minor additions to the extent of the existing Industrial Zones in the Wakatipu Ward to avoid unnecessary split zonings or to correctly zone existing industrial related activities;
- e) Remove the existing Ballantyne Road Mixed Use Zone from the existing set of Industrial Zones and rezone this land Open Space – Active Sport and Recreation.
- f) Identify additional land to be included within the GIZ in the Wanaka Ward to the North of Ballantyne Road adjacent to the existing Ballantyne Road Mixed Use Zone; and
- g) Vary relevant parts of the Proposed District Plan (**PDP**) Chapter 25 (Earthworks), Chapter 27 (Subdivision and Development), Chapter 29 (Transport) and Chapter 36 (Noise) to introduce the Zone to these chapters and to give effect to the direction of the GIZ.

1.5. The GIZ (Chapter 18A) will assist the Council to fulfil its statutory functions and responsibilities as required by the Resource Management Act 1991 (**'the Act'** or **'the RMA'**).

## 2. INTRODUCTION

2.1. Section 32 of the Act requires objectives in proposals to be examined for their appropriateness in achieving the purpose of the Act, and that the policies and methods of those proposals be examined for their costs, benefits, efficiency, effectiveness and risk in achieving the objectives.

2.2. The purpose of this proposal is to introduce the GIZ into the PDP framework. The GIZ comprises a suite of objectives, policies and rules that provide for the establishment, operation and long term viability of Industrial and Service activities. This proposal also recommends the following associated variations to the PDP to introduce land which had not previously been notified as part of Stages 1 and 2 to the PDP, and to identify the following GIZ specific controls:

- a) Chapter 25 (Earthworks) to identify a specific control on the volume of earthworks permitted within the GIZ;
- b) Chapter 27 (Subdivision and Development) to identify an objective, associated policies and minimum lot size controls specific to the GIZ;
- c) Chapter 29 (Transport) to identify activities within the GIZ as being required to provide off-street loading space, and include associated policy support for this provision; and
- d) Chapter 36 (Noise) to identify a rule controlling the effects of noise from activities operating within the GIZ and to include the GIZ as a zone in which critical listening environments are controlled.

2.3. The Industrial Zones were used as the basis of the proposal. Monitoring of the Business and Industrial Zones was undertaken in July 2010<sup>1</sup> and November 2011<sup>2</sup>. Additional ground truth

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<sup>1</sup> Queenstown Lakes District Council, Industrial and Business Zone Review, July 2010

<sup>2</sup> Monitoring Report for the Business and Industrial Zones, Policy and Planning, Queenstown Lakes District Council, November 2011

based monitoring was undertaken in January 2019 to identify land use activities being undertaken on sites located within the Industrial Zones.

2.4. The evaluation of the appropriateness of the proposed GIZ objectives, policies and rules is based upon addressing the following broad resource management issues:

- Issue 1 - Understanding the District's industrial economy
- Issue 2 - Non-industrial activities within the Industrial Zones
- Issue 3 - Industrial Development Capacity
- Issue 4 - Structure and complexity of the Industrial Zone framework
- Issue 5 - Minimum lot size within the Industrial Zones
- Issue 6 - Parking, manoeuvring and loading
- Issue 7 - Amenity within and outside of the Industrial Zones
- Issue 8 - Split zonings, inappropriate zoning layout and re-zonings

2.5. Addressing the issues set out above will result in a more appropriate regime of managing the effects of activities on land currently located within the Industrial Zones and is consistent with achieving the purpose of the Act.

2.6. The General Industrial Zone applies to land notified in Stage 3 of the Proposed District Plan review and is shown on the Planning Maps attached to the Stage 3 bundle.

### **3. DISTRICT PLAN REVIEW**

3.1. The review of the ODP is being undertaken in stages. Stage 1 commenced in April 2014 and was publicly notified on 26 August 2015. Hearings on Stage 1 components comprising ten individual hearing streams for 33 chapters, 1 variation<sup>3</sup> and three separate hearing streams for rezoning requests and mapping annotations<sup>4</sup> were held from March 2016 to September 2017.

3.2. On 29 September 2016 the Council approved the commencement of Stage 2. As part of these resolutions, the Council addressed what the plan outcome would be at the end of the partial review, and approved the separation of the District Plan into two volumes, Volume A and Volume B.

3.3. Volume A (at the point in time of notification of Stage 3) consists of the PDP chapters notified in Stages 1 and 2 of the PDP. The below table seeks to illustrate the components of the PDP which were reviewed during each of the subsequent stages.

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<sup>3</sup> Variation 1 – Arrowtown Design Guidelines 2016

<sup>4</sup> Ski Area Sub Zones, Upper Clutha Area and the Queenstown Area (excluding the Wakatipu Basin).

3.4. Stage 3 of the District Plan Review comprises the following topics:

- Mapping sites of significance to Iwi/Wāhi Tūpuna
- Township Zones
- Design Guidelines to assist with the implementation of the Residential and Business Mixed Use Zones (PDP Chapters 7, 8, 9 and 15)
- Industrial & Industrial B Zones
- Rural Visitor Zones
- Ballantyne Road Mixed Use Zone
- Three Parks Special Zone

3.5. The Stage 3 maps show the land that is subject to Stage 3 of the District Plan Review.

3.6. All land that is not subject to Stages 1 – 3 of the District Plan Review currently forms Volume B of the District Plan. This includes zones that have not yet been reviewed and notified, land that has been withdrawn from the District Plan review (i.e. the land subject to Plan Changes 46 - Ballantyne Road Industrial and Residential extensions, 50 - Queenstown Town Centre extension and 51 – Peninsula Bay North) and the Frankton Flats B Special Zone and the Remarkables Park Special Zone. All Volume B land is subject to the ODP.

3.7. At the time of notification of Stage 3, decisions have been made on Stages 1 & 2, and the subsequent appeal process is in train.

#### 4. PURPOSE OF THE REPORT

4.1. Section 32 of the Act requires objectives in proposals to be examined for their appropriateness in achieving the purpose of the Act, and the policies and methods of those proposals to be examined for their efficiency, effectiveness and risk in achieving the objectives (MFE, 2014). This report fulfils the obligations of the Council under section 32 of the Act. The analysis set out below (within sections 6 to 12) should be read together with the text of Chapter 18A GIZ.

4.2. This report provides an analysis of the key issues, objectives and the policy response for Chapter 18A GIZ of the PDP under the following headings;

- a) The **Consultation** undertaken, including engagement with iwi authorities on the draft plan.
- b) An overview of the applicable **Statutory Policy Context** (Section 6)
- c) Description of the **Non-Statutory Context** (strategies, studies and community plans), which have informed the proposed provisions (Section 6.35);

- d) A description of the **Resource Management Issues**, which provide the driver for the proposed provisions (Section 7);
- e) A **level of detail** that corresponds to the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposal (Section 32(1)(c)) (Section 8);
- f) An **Evaluation** against Section 32(1)(a) and Section 32(1)(b) of the Act (Sections 9, 10 and 11), that is;
  - (a) Whether the objectives are the most appropriate way to achieve the RMA's purpose (Section 32(1)(a)).
  - (b) Whether the provisions (policies and methods) are the most appropriate way to achieve the objectives (Section 32(1)(b)), including:
    - (i) identifying other reasonably practicable options for achieving the objectives
    - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives, and
    - (iii) summarising the reasons for deciding on the provisions; and
- g) Consideration of **Risk** (Section 12).

## 5. CONSULTATION

- 5.1. Consultation with Iwi authorities, required pursuant to Schedule 1, clause 4A of the RMA, was also undertaken between 9 July and 28 July 2019, whereby a set of draft provisions were provided to Iwi representatives for consideration and comment. The Iwi authorities did not request any changes to the draft provisions and did not provide any comment.

## 6. STATUTORY POLICY CONTEXT

### Resource Management Act 1991

- 6.1. Section 5 sets out the purpose of the RMA, which requires an integrated planning approach and direction to promote the sustainable management of natural and physical resources. Guidance as to how the overall sustainable management purpose is to be achieved is provided in the other sections, including sections 6, 7 and 8 of Part 2 of the Act:

#### **5 Purpose**

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.*
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people*

*and communities to provide for their social, economic, and cultural well-being and for their health and safety while—*

- (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and*
- (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

6.2. Section 6 of the RMA sets out a number of matters of national importance that are to be recognised and provided for. The following section 6 matters are applicable:

- (b) the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*
- (e) the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:*
- (h) the management of significant risks from natural hazards.*

6.3. Section 7 lists “other matters” that Council shall have particular regard to and those most relevant to the GIZ include the following:

- (b) the efficient use and development of natural and physical resources:*
- (c) the maintenance and enhancement of amenity values:*
- (f) maintenance and enhancement of the quality of the environment:*
- (g) any finite characteristics of natural and physical resources:*
- (i) the effects of climate change:*

6.4. Section 8 requires that Council take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi). The principles as they relate to resource management derive from Te Tiriti o Waitangi itself and from resource management case law and practice. They can be summarised as follows:

- a) That there must be active protection of the partnership between the two parties;
- b) That there is an obligation to act with reasonableness and good faith, with both parties being prepared to compromise; and
- c) That dialogue and consultation will be the main way in which to give effect to the three principles outlined above.

## **Other National Legislation or Policy Statements**

### **NPS on Urban Development Capacity 2016 (NPS-UDC)**



- 6.5. Queenstown Lakes District (**the District**) is identified as a 'high growth urban area'<sup>5</sup> under the National Policy Statement on Urban Development Capacity (**NPS-UDC**) and is therefore subject to the full suite of NPS-UDC provisions and requirements. Local authorities identified as containing high growth urban areas are required to comprehensively assess demand and capacity for both housing and business activities at least every three years commencing 31 December 2017.
- 6.6. The Council produced its first set of housing and business development capacity assessments in March 2018. For the purpose of this review, the Business Development Capacity Assessment<sup>6</sup> (**BDCA**) is relevant and has been appended to this report as Appendix 2.
- 6.7. Matters relating to industrial development have been addressed in the proceeding sections of this report.

### **National Planning Standards 2019**

- 6.8. In April 2019 the Government released a set of National Planning Standards<sup>7</sup> (**planning standards**) that require all regional policy statements, regional plans and district plans to have a consistent structure and format. The planning standards also prescribe certain definitions, noise and vibration metrics and requirements for electronic functionality and accessibility. The planning standards have been introduced to improve the efficiency and effectiveness of the planning system, rather than seeking to alter the outcomes of policy statements or plans<sup>8</sup>. Queenstown Lakes District has seven years to adopt the planning standards and ePlan requirements and nine years to implement the standard definitions.
- 6.9. The planning standards have been considered when reviewing the ODP Industrial Zone provisions and, where possible within the scope of this review, the proposal recommends a zoning framework and provisions that assist with implementing the planning standards. The most notable of these recommendations, is to re-cast the ODP Industrial Zones as the GIZ, and to avoid the use of definitions from the ODP which do not fit in with those of the planning standards.
- 6.10. Whilst Stage 3 presents an opportunity to commence implementation of the planning standards, it would be inefficient to implement planning standards in the mid-point of the plan review for a single chapter, or for provisions that apply to the entire District Plan (such as the standard definitions and mapping conventions) alongside provisions that were not designed to interact with

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<sup>5</sup> Interpretation section, National Policy Statement on Urban Development Capacity, 2016

<sup>6</sup> Business Development Capacity Assessment 2017, Queenstown Lakes District, 15 March 2018 – draft final  
<https://www.qldc.govt.nz/assets/Uploads/Council-Documents/Committees/Planning-and-Strategy-Committee/10-May-2018/Item-1-Attachment-A-Business-Capacity-Assessment-2017-Final-1.5.2018.pdf>

<sup>7</sup> <https://www.mfe.govt.nz/sites/default/files/media/RMA/national-planning-standards.pdf>

<sup>8</sup> National Planning Standards 2019; part 1: Foundation Standard.

the planning standards. Implementing planning standards in an iterative way would be inefficient and unnecessary complex, particularly in the context of the staged review of the Plan, which in turn is subject to a large number of appeals which are also at various different stages towards being concluded. A pragmatic approach has therefore been taken to implementing the planning standards where possible, noting that there is no requirement to do this at the present time.

## Iwi Management Plans

6.11. When preparing or changing a district plan, Section 74(2A)(a) of the RMA states that Councils must take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

6.12. The following iwi management plans are relevant:

*The Cry of the People, Te Tangi a Tauira*: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 (MNRMP 2008); and

*Kāi Tahu ki Otago* Natural Resource Management Plan 2005 (KTKO NRMP 2005)

**The Cry of the People, Te Tangi a Tauira: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008**

6.13. The Queenstown Lakes District is identified as being located within the 'Takitimu Me Ona Uri: High Country and Foothills' area of interest.<sup>9</sup> Section 3.4 of the MNRMP 2008 sets out the policies for this area of interest. The following policies of section 3.4 are relevant:

Reference	Detail
3.4.13	<p>Hazardous Substances and New Organisms</p> <ol style="list-style-type: none"> <li>1. Require appropriate consultation with regards to Hazardous Substances or New Organisms applications. Pre application, site visits, and presentation of findings are encouraged. Continued liaison with Te Rūnanga o Ngāi Tahu is essential.</li> <li>2. Consultation and communication of highly technical information should in addition be presented in plain language, to enable rūnanga (and other community groups) to make informed decisions.</li> <li>3. Consider any application for Hazardous Substances or New Organisms in terms of the potential effects, both positive and adverse, on indigenous biodiversity.</li> <li>5. Oppose the use of any hazardous substances where it is likely that such use will have an affect on water quality and land, influencing the life supporting and productive capacity of both.</li> </ol>

<sup>9</sup> Page 64, Part 3, Wāhi Tuatoru – Ngā Kaupapa Policy, *The Cry of the People, Te Tangi a Tauira: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008* (MNRMP 2008);

Section 3.1 sets out policies relating to climate change which apply to the entirety of the area covered by the MNRMP 2008. The following policies of Section 3.1 are relevant:

Reference	Detail
3.1.1	<p>Localised Influences on the Global Environment</p> <ol style="list-style-type: none"> <li>11. Actively support the promotion of appropriate disposal of toxic emissions and discharge methods through improved technology.</li> <li>12. Support further development and improvement of contingency measures to recognise for increased natural hazard risk as a result of sea level rise and unpredictable weather patterns. Ngāi Tahu ki Murihiku will take an active role in the development of contingency measures and education of local communities.</li> </ol>
3.1.2	<p>Economy and Industry</p> <ol style="list-style-type: none"> <li>8. Participate in planning for climate change and its potential risks to ensure industries and communities are well placed (build resilience) to deal with climate change conditions in the future. Such involvement could include building of partnerships with scientists, sharing of information, enhanced community engagement and education, joint management and co management of resources, and enhanced economic development through changing environments and technologies.</li> </ol>

Section 3.2 sets out policies relating to air which apply to the entirety of the area covered by the MNRMP 2008. The following policies of Section 3.2 are relevant:

Reference	Detail
3.2.1	<p>Discharges to Air</p> <ol style="list-style-type: none"> <li>1. Discourage discharges from industrial and trade premises that will have an impact on mahinga kai, taonga species, biodiversity, wāhi tapu and wāhi taonga.</li> <li>2. Ensure that the processes used during activities that discharge to air are supervised and monitored to ensure that contaminant emissions are minimised.</li> <li>5. Support and advocate for controlled use and appropriate storage of highly toxic and hazardous substances within the region.</li> <li>9. Discourage and prevent discharges to air that will have impacts on cultural well-being and community health.</li> <li>10. Ensure that discharges of contaminants into the air such as dust, smoke and odour do not affect the amenity values of areas which are of cultural and historical significance to iwi.</li> <li>12. Engage Ngāi Tahu ki Murihiku early in the consenting and permitting process for activities whereby there is discharge to air, particularly agrichemical and aerial spraying/topdressing and activities causing offensive odours. Discharges must not cause objectionable or offensive odour to the extent that it causes adverse effects beyond the boundaries of the consent holder's property.</li> <li>15. Encourage techniques to eliminate the effects of light pollution. Techniques should be introduced during planning phases for new suburban and coastal subdivisions and when assessing harbour and port procedures.</li> </ol>
3.2.2	<p>Amenity Values</p> <ol style="list-style-type: none"> <li>1. Limit through promotion of improved production and techniques, visual and physical effects from activities associated with exhaust emissions, dust, unacceptable and intense odour, smoke and lighting.</li> <li>2. Ensure where avoidable that impacts from activities that create effects such as glare, shading, or electrical disturbance do not interfere with the amenity values associated with a place, environment or neighbouring property.</li> </ol>

	<ol style="list-style-type: none"> <li>3. Ngāi Tahu ki Murihiku shall actively participate in interagency and cross boundary decision making in respect to development, design and placement of structures and where appropriate may provide qualified recommendations for the protection of amenity values.</li> <li>4. Ngāi Tahu ki Murihiku shall provide qualified recommendations with respect to concerns raised related to odour and offensive discharge, from rural, urban and industrial activities.</li> <li>6. Where there may be visual impacts on the natural and cultural landscapes as a result of development, encourage the integration of landscaping techniques which utilise reserve planting or vegetation screens to soften intrusion.</li> </ol>
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### Kāi Tahu ki Otago Natural Resource Management Plan 2005

6.14. Issues, objectives and policies for all catchments across the Otago Region are recorded in Chapter 5 of the KTKO NRMP 2005. The following overall objectives and policies are relevant:

Reference	Detail
5.2	<p>Overall Objectives</p> <ol style="list-style-type: none"> <li>i. The rakātirataka and kaitiakitaka of Kāi Tahu ki Otago is recognised and supported.</li> <li>ii. Ki Uta Ki Tai management of natural resources is adopted within the Otago region.</li> <li>iii. The mana of Kāi Tahu ki Otago is upheld through the management of natural, physical and historic resources in the Otago Region.</li> <li>iv. Kāi Tahu ki Otago have effective participation in all resource management activities within the Otago Region.</li> <li>v. The respective roles and responsibilities of Manawhenua within the Otago Region are recognised and provided for through the other objectives and policies of the Plan.</li> </ol>
5.4.3	<p>Wāhi Tapu Objectives:</p> <ol style="list-style-type: none"> <li>i. All wāhi tapu are protected from inappropriate activities.</li> <li>ii. Kāi Tahu ki Otago have access to wāhi tapu.</li> <li>iii. Wāhi tapu throughout the Otago region are protected in a culturally appropriate manner.</li> </ol>
5.4.4	<p>Wāhi Tapu General Policies</p> <ol style="list-style-type: none"> <li>1. To require consultation with Kāi Tahu ki Otago for activities that have the potential to affect wāhi tapu</li> <li>2. To promote the establishment of processes with appropriate agencies that: <ol style="list-style-type: none"> <li>i. enable the accurate identification and protection of wāhi tapu.</li> <li>ii. provide for the protection of sensitive information about the specific location and nature of wāhi tapu.</li> <li>iii. ensure that agencies contact Kāi Tahu ki Otago before granting consents or confirming an activity is permitted, to ensure that wāhi tapu are not adversely affected</li> </ol> </li> </ol> <p>Earth Disturbance:</p> <ol style="list-style-type: none"> <li>4. To require that a Kāi Tahu ki Otago mandated archaeologist survey an area before any earth disturbance work commences.</li> <li>5. To promote the use of Accidental Discovery Protocols for any earth disturbance work.</li> <li>6. To require all Māori archaeological finds to remain the cultural property of Kāi Tahu ki Otago.</li> </ol>
5.6.3	Cultural Landscapes Objectives

	<ul style="list-style-type: none"> <li>i. The relationship that Kāi Tahu ki Otago have with land is recognised in all resource management activities and decisions.</li> </ul>
5.6.4	<p>Cultural Landscapes General Policies</p> <ul style="list-style-type: none"> <li>1. To identify and protect the full range of landscape features of significance to Kāi Tahu ki Otago.</li> </ul> <p>Earth Disturbance:</p> <ul style="list-style-type: none"> <li>19. To require all earthworks, excavation, filling or the disposal of excavated material to: <ul style="list-style-type: none"> <li>i. Avoid adverse impacts on significant natural landforms and areas of indigenous vegetation;</li> <li>ii. Avoid, remedy, or mitigate soil instability; and accelerated erosion;</li> <li>iii. Mitigate all adverse effects.</li> </ul> </li> </ul> <p>Structures:</p> <ul style="list-style-type: none"> <li>24. To discourage the erection of structures, both temporary and permanent, in culturally significant landscapes, lakes, rivers or the coastal environment.</li> </ul> <p>Subdivisions:</p> <ul style="list-style-type: none"> <li>26. To encourage a holistic planning approach to subdivisions between the Local Government Agencies that takes into account the following: <ul style="list-style-type: none"> <li>i. All consents related to the subdivision to be sought at the same time.</li> <li>ii. Protection of Kāi Tahu ki Otago cultural values.</li> <li>iii. Visual amenity.</li> <li>iv. Water requirements.</li> <li>v. Wastewater and storm water treatment and disposal.</li> <li>vi. Landscaping.</li> <li>vii. Location of building platforms</li> </ul> </li> <li>27. To require that where any earthworks are proposed as part of a subdivision activity, an accidental discovery protocol is to be signed between the affected papatipu Rūnaka and the Company.</li> <li>28. To require applicants, prior to applying for subdivision consents, to contact Kāi Tahu ki Otago to determine the proximity of the proposed subdivision to sites of significance identified in the resource inventory.</li> </ul>
5.7.2	<p>Air and Atmosphere Objectives</p> <ul style="list-style-type: none"> <li>i. Kāi Tahu ki Otago sites of significance are free from odour, visual and other pollutants.</li> <li>iii. The life supporting capacity and mauri of air is maintained for future generations.</li> <li>iii. The life supporting capacity and mauri of air is maintained for future generations.</li> </ul>
5.7.3	<p>Policies</p> <ul style="list-style-type: none"> <li>1. To require earthworks and discharges to air consider the impact of dust and other air-borne contaminants on health, mahika kai, cultural landscapes, indigenous flora and fauna, wāhi tapu and taoka.</li> <li>12. To require light suppression techniques are used for any new subdivisions and replacement lighting</li> </ul>

6.15. Part 10: Clutha/Mata-au Catchments Te Riu o Mata-au outlines the issues, objectives and policies for the Clutha/Mata-au Catchments. Included in this chapter is a description of some of the Kāi Tahu ki Otago values associated with the Clutha/Mata-au Catchments. The following Clutha/Mata-au specific objectives and policies are relevant:

Reference	Detail
10.2.3	<p>Wai Māori Policies in the Clutha/Mata-au Catchment</p> <p>Land use:</p> <ol style="list-style-type: none"> <li>9. To encourage the adoption of sound environmental practices, adopted where land use intensification occurs.</li> <li>10. To promote sustainable land use in the Clutha/Mata-au Catchment.</li> <li>11. To encourage all consents related to subdivision and lifestyle blocks are applied for at the same time including, land use consents, water consents, and discharge consents.</li> <li>12. To require reticulated community sewerage schemes that have the capacity to accommodate future population growth.</li> </ol>

6.16. In accordance with the above, the relevant provisions of the Iwi Management Plans have been taken into account in this s32 analysis.

### Regional Policy Statements

6.17. Section 74 of the Act requires that a district plan prepared by a territorial authority must “give effect to” any operative Regional Policy Statement. The Partially Operative Otago Regional Policy Statement 2019 (**PORPS 19**) and the Partially Operative Otago Regional Policy Statement 1998 (**PORPS 98**) are the relevant regional policy statements to be given effect to within the PDP.

### Partially Operative Regional Policy Statement 2019

Reference	Detail
Objective 1.1	Otago’s resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities
Policy 1.1.1	<p><b>Economic wellbeing</b></p> <p>Provide for the economic wellbeing of Otago’s people and communities by enabling the resilient and sustainable use and development of natural and physical resources.</p>
Policy 1.1.2	<p><b>Social and cultural wellbeing and health and safety</b></p> <p>Provide for the social and cultural wellbeing and health and safety of Otago’s people and communities when undertaking the subdivision, use, development and protection of natural and physical resources by all of the following:</p> <ol style="list-style-type: none"> <li>a) Recognising and providing for Kāi Tahu values;</li> <li>c) Taking into account the diverse needs of Otago’s people and communities;</li> <li>d) Avoiding significant adverse effects of activities on human health;</li> <li>e) Promoting community resilience and the need to secure resources for the reasonable needs for human wellbeing;</li> </ol>
Policy 1.2.1	<p><b>Integrated resource management</b></p> <p>Achieve integrated management of Otago’s natural and physical resources, by all of the following:</p> <ol style="list-style-type: none"> <li>c) Recognising that the value and function of a natural or physical resource may extend beyond the immediate, or directly adjacent, area of interest;</li> <li>f) Managing adverse effects of activities to give effect to the objectives and policies of the Regional Policy Statement.</li> </ol>

Objective 2.1	The principles of Te Tiriti o Waitangi are taken into account in resource management processes and decisions
Policy 2.1.2	<b>Treaty principles</b> Ensure that local authorities exercise their functions and powers, by: <ul style="list-style-type: none"> <li>a) Recognising Kāi Tahu's status as a Treaty partner; and</li> <li>b) Involving Kāi Tahu in resource management processes implementation;</li> <li>c) Taking into account Kāi Tahu values in resource management decision-making processes and implementation;</li> <li>h) Taking into account iwi management plans.</li> </ul>
Policy 2.2.1	<b>Kāi Tahu wellbeing</b> Manage the natural environment to support Kāi Tahu wellbeing by all of the following: <ul style="list-style-type: none"> <li>b) Safe-guarding the life-supporting capacity of natural resources.</li> </ul>
Objective 4.1	Risks that natural hazards pose to Otago's communities are minimised
Policy 4.1.3	<b>Assessing activities for natural hazard risk</b> Assess activities for natural hazard risk to people, property and communities, by considering all of the following: <ul style="list-style-type: none"> <li>a) The natural hazard risk identified, including residual risk;</li> <li>b) Any measures to avoid, remedy or mitigate those risks, including relocation and recovery methods;</li> <li>c) The long-term viability and affordability of those measures;</li> <li>d) Flow-on effects of the risk to other activities, individuals and communities;</li> <li>e) The availability of, and ability to provide, lifeline utilities, and essential and emergency services, during and after a natural hazard event.</li> </ul>
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
Policy 4.5.1	<b>Providing for urban growth and development</b> Provide for urban growth and development in a strategic and co-ordinated way, including by: <ul style="list-style-type: none"> <li>b) Monitoring supply and demand of residential, commercial and industrial zoned land;</li> <li>c) Ensuring that there is sufficient housing and business land development capacity available in Otago;</li> <li>f) Having particular regard to:               <ul style="list-style-type: none"> <li>ii. Minimising competing demands for natural resources;</li> </ul> </li> <li>g) Ensuring efficient use of land;</li> <li>h) Restricting urban growth and development to areas that avoid reverse sensitivity effects unless those effects can be adequately managed;</li> </ul>
Policy 4.5.3	<b>Urban design</b> Design new urban development with regard to: <ul style="list-style-type: none"> <li>a) A resilient, safe and healthy community;</li> <li>b) A built form that relates well to its surrounding environment;</li> <li>c) Reducing risk from natural hazards;</li> <li>h) A diverse range of housing, commercial, industrial and service activities;</li> </ul>
Objective 4.6	Hazardous substances, contaminated land and waste materials do not harm human health or the quality of the environment in Otago
Policy 4.6.1	<b>Hazardous Substances</b> Promote an integrated approach to the management of hazardous substances in Otago

Policy 4.6.2	<p><b>Use, storage and disposal of hazardous substances</b></p> <p>Manage the use, storage and disposal of hazardous substances, by all of the following:</p> <ul style="list-style-type: none"> <li>a) Providing secure containment for the storage of hazardous substances;</li> <li>b) Minimising risk associated with natural hazard events;</li> <li>c) Ensuring the health and safety of people;</li> <li>d) Avoiding, remedying or mitigating adverse effects on the environment;</li> <li>e) Providing for the development of facilities to safely store, transfer, process, handle and dispose of hazardous substances;</li> <li>f) Ensuring hazardous substances are treated or disposed of in accordance with the relevant regulatory requirements;</li> <li>g) Restricting the location and intensification of activities that may result in reverse sensitivity effects near authorised facilities for hazardous substance bulk storage, treatment or disposal;</li> <li>h) Encouraging the use of best management practices.</li> </ul>
Policy 4.6.9	<p><b>New contaminated land</b></p> <p>Avoid the creation of new contaminated land or, where this is not practicable, minimise adverse effects on the environment.</p>
Objective 5.3	<p><b>Sufficient land is managed and protected for economic production</b></p>
Policy 5.3.2	<p><b>Distribution of commercial activities</b></p> <p>Manage the distribution of commercial activities by:</p> <ul style="list-style-type: none"> <li>c) Restricting commercial activities outside of a) and b) when such activities are likely to undermine the vibrancy and viability of those centres;</li> </ul> <p>(for clarity purposes:</p> <ul style="list-style-type: none"> <li>a) Enabling a wide variety of commercial, social and cultural activities in central business districts, and town and commercial centres;</li> <li>b) Enabling smaller commercial centres to service local community needs;)</li> </ul>
Policy 5.3.3	<p><b>Industrial land</b></p> <p>Manage the finite nature of land suitable and available for industrial activities, by all of the following:</p> <ul style="list-style-type: none"> <li>a) Providing specific areas to accommodate the effects of industrial activities;</li> <li>b) Providing a range of land suitable for different industrial activities, including land-extensive activities;</li> <li>c) Restricting the establishment of activities in industrial areas that are likely to result in: <ul style="list-style-type: none"> <li>i. Reverse sensitivity effects; or</li> <li>ii. Inefficient use of industrial land or infrastructure.</li> </ul> </li> </ul>
Objective 5.4	<p>Adverse effects of using and enjoying Otago's natural and physical resources are minimised</p>
Policy 5.4.1	<p><b>Offensive or objectionable discharges</b></p> <p>Manage offensive or objectionable discharges to land, water and air by:</p> <ul style="list-style-type: none"> <li>a) Avoiding significant adverse effects of those discharges;</li> <li>c) Avoiding, remedying or mitigating other adverse effects of those discharges.</li> </ul>
Policy 5.4.3	<p><b>Precautionary approach to adverse effects</b></p> <p>Apply a precautionary approach to activities where adverse effects may be uncertain, not able to be determined, or poorly understood but are potentially significant or irreversible.</p>



## Partially Operative Regional Policy Statement 1998<sup>10</sup>

Reference	Detail
Objective 5.4.1	To promote the sustainable management of Otago's land resources in order: (a) To maintain and enhance the primary productive capacity and life-supporting capacity of land resources; and (b) To meet the present and reasonably foreseeable needs of Otago's people and communities.
Objective 5.4.2	To avoid, remedy or mitigate degradation of Otago's natural and physical resources resulting from activities utilising the land resource.
Objective 5.4.3	To protect Otago's outstanding natural features and landscapes from inappropriate subdivision, use and development.
Policy 5.5.2	To promote the retention of the primary productive capacity of Otago's existing high class soils to meet the reasonably foreseeable needs of future generations and the avoidance of uses that have the effect of removing those soils or their life-supporting capacity and to remedy or mitigate the adverse effects on the high class soils resource where avoidance is not practicable.
Policy 5.5.3	To maintain and enhance Otago's land resource through avoiding, remedying or mitigating the adverse effects of activities which have the potential to, among other adverse effects: (a) Reduce the soil's life-supporting capacity (b) Reduce healthy vegetative cover (c) Cause soil loss (d) Contaminate soils (e) Reduce soil productivity (f) Compact soils (g) Reduce soil moisture holding capacity.
Policy 5.5.4	To promote the diversification and use of Otago's land resource to achieve sustainable landuse and management systems for future generations.
Policy 5.5.5	To minimise the adverse effects of landuse activities on the quality and quantity of Otago's water resource through promoting and encouraging the: (a) Creation, retention and where practicable enhancement of riparian margins; and (b) Maintaining and where practicable enhancing, vegetation cover, upland bogs and wetlands to safeguard land and water values; and (c) Avoiding, remedying or mitigating the degradation of groundwater and surface water resources caused by the introduction of contaminants in the form of chemicals, nutrients and sediments resulting from landuse activities.
Objective 6.4.2	To maintain and enhance the quality of Otago's water resources in order to meet the present and reasonably foreseeable needs of Otago's communities.
Objective 9.4.3	To avoid, remedy or mitigate the adverse effects of Otago's built environment on Otago's natural and physical resources.
Policy 9.5.4	To minimise the adverse effects of urban development and settlement, including structures, on Otago's environment through avoiding, remedying or mitigating: (a) Discharges of contaminants to Otago's air, water or land; and (c) Visual intrusion and a reduction in landscape qualities; and (d) Significant irreversible effects on: (vi) Amenity values; or

<sup>10</sup> <https://www.orc.govt.nz/media/6355/orc-1998-rps-revoked-provisions.pdf>

## Proposed District Plan

6.18. The following objectives and policies (or parts thereof) of the PDP (Part 2 Strategic) are relevant to this proposal should take into account and give effect to these provisions:

### Strategic Direction Chapter 3

Reference	Detail
Objective 3.2.1	The development of a prosperous, resilient and equitable economy in the District.
Policy 3.2.1.2	The Queenstown and Wanaka town centres <sup>11</sup> are the hubs of New Zealand's premier alpine visitor resorts and the District's economy.
Policy 3.2.1.3	The Frankton urban area functions as a commercial and industrial service centre, and provides community facilities, for the people of the Wakatipu Basin.
Policy 3.2.1.4	The key function of the commercial core of Three Parks is focused on large format retail development.
Policy 3.2.1.5	Local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka town centres <sup>12</sup> , Frankton and Three Parks, are sustained.
Policy 3.2.1.6	Diversification of the District's economic base and creation of employment opportunities through the development of innovative and sustainable enterprises.
Objective 3.2.2	Urban growth is managed in a strategic and integrated manner.
Policy 3.2.2.1	Urban development occurs in a logical manner so as to:  c. achieve a built environment that provides desirable, healthy and safe places to live, work and play;  h. be integrated with existing, and planned future, infrastructure.
Objective 3.2.4	The distinctive natural environments and ecosystems of the District are protected.
Policy 3.2.4.1	Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.
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.

<sup>11</sup> Defined by the extent of the Town Centre Zone in each case

<sup>12</sup> Defined by the extent of the Town Centre Zone in each case

Strategic Policy 3.3.3	Avoid commercial zoning that could undermine the role of the Queenstown and Wanaka town centres as the primary focus for the District's economic activity.
Strategic Policy 3.3.4	Provide a planning framework for the Frankton urban area that facilitates the integration of the various development nodes.
Strategic Policy 3.3.5	Recognise that Queenstown Airport makes an important contribution to the prosperity and resilience of the District.
Strategic Policy 3.3.6	Avoid additional commercial zoning that will undermine the function and viability of the Frankton commercial areas as the key service centre for the Wakatipu Basin, or which will undermine increasing integration between those areas and the industrial and residential areas of Frankton.
Strategic Policy 3.3.8	Avoid non-industrial activities not ancillary to industrial activities occurring within areas zoned for industrial activities.
Strategic Policy 3.3.10	Avoid commercial rezoning that would undermine the key local service and employment function role that the centres outside of the Queenstown and Wanaka town centres, Frankton and Three Parks fulfil.
Strategic Policy 3.3.11	Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.
Strategic Policy 3.3.13	Apply Urban growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Jack's Point), Wanaka and Lake Hawea Township.

6.19. The Strategic Directions seek to enable development while protecting the valued natural and physical resources of the District. The proposal is required to give effect to these obligations.

#### Urban Development Chapter 4:

Reference	Detail
Objective 4.2.1	Urban Growth Boundaries used as a tool to manage the growth of larger urban areas within distinct and defensible urban edges.
Policy 4.2.1.1	Define Urban Growth Boundaries to identify the areas that are available for the growth of the main urban settlements
Policy 4.2.1.2	Focus urban development on land within and at selected locations adjacent to the existing larger urban settlements and to a lesser extent, accommodate urban development within smaller rural settlements.
Policy 4.2.1.4	Ensure Urban Growth Boundaries encompass a sufficient area consistent with: <ul style="list-style-type: none"> <li>a. the anticipated demand for urban development within the Wakatipu and Upper Clutha Basins over the planning period assuming a mix of housing densities and form;</li> </ul>

	<ul style="list-style-type: none"> <li>b. ensuring the ongoing availability of a competitive land supply for urban purposes;</li> <li>c. the constraints on development of the land such as its topography, its ecological, heritage, cultural or landscape significance; or the risk of natural hazards limiting the ability of the land to accommodate growth;</li> <li>d. the need to make provision for the location and efficient operation of infrastructure, commercial and industrial uses, and a range of community activities and facilities;</li> <li>e. a compact and efficient urban form;</li> <li>f. avoiding sporadic urban development in rural areas;</li> <li>g. minimising the loss of the productive potential and soil resource of rural land</li> </ul>
Policy 4.2.1.6	Review and amend Urban Growth Boundaries over time, as required to address changing community needs.
Objective 4.2.2B	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.
Policy 4.2.2.1	Integrate urban development with the capacity of existing or planned infrastructure so that the capacity of that infrastructure is not exceeded and reverse sensitivity effects on regionally significant infrastructure are minimised.
Policy 4.2.2.2	<p>Allocate land within Urban Growth Boundaries into zones which are reflective of the appropriate land use having regard to:</p> <ul style="list-style-type: none"> <li>a. its topography;</li> <li>b. its ecological, heritage, cultural or landscape significance if any;</li> <li>c. any risk of natural hazards, taking into account the effects of climate change;</li> <li>d. connectivity and integration with existing urban development;</li> <li>e. convenient linkages with public transport;</li> <li>f. the need to provide a mix of housing densities and forms within a compact and integrated urban environment;</li> <li>g. the need to make provision for the location and efficient operation of regionally significant infrastructure;</li> <li>h. the need to provide open spaces and community facilities that are located and designed to be safe, desirable and accessible;</li> <li>i. the function and role of the town centres and other commercial and industrial areas as provided for in Chapter 3 Strategic Objectives 3.2.1.2 - 3.2.1.5 and associated policies; and</li> <li>j. the need to locate emergency services at strategic locations.</li> </ul>

Policy 4.2.2.9	Ensure Council-led and private design and development of public spaces and built development maximises public safety by adopting “Crime Prevention Through Environmental Design”.
Policy 4.2.2.10	Ensure lighting standards for urban development avoid unnecessary adverse effects on views of the night sky.
Policy 4.2.2.12	Ensure that any transition to rural areas is contained within the relevant Urban Growth Boundary
Policy 4.2.2.17	Protect the airport from reverse sensitivity effects of any Activity Sensitive to Aircraft Noise via a range of zoning methods.
Policy 4.2.2.18	Ensure that Critical Listening Environments of all new buildings and alterations and additions to existing buildings containing an Activity Sensitive to Aircraft Noise within the Queenstown Airport Air Noise boundary or Outer Control boundary are designed and built to achieve appropriate Indoor Design Sound Levels.
Policy 4.2.2.22	Define the Urban Growth Boundaries for Wanaka and Lake Hawea Township, as shown on the District Plan Maps that: <ul style="list-style-type: none"> <li>a. are based on existing urbanised areas;</li> <li>k. have community support as expressed through strategic community planning processes;</li> <li>l. avoid sprawling and sporadic urban development across the rural areas of the Upper Clutha Basin</li> </ul>
Policy 4.2.2.23	Rural land outside of the Urban Growth Boundaries is not used for urban development until further investigations indicate that more land is needed to meet demand for urban development in the Upper Clutha Basin and a change to the Plan amends the Urban Growth Boundary and zones additional land for urban development purposes

6.20. The Urban Development objectives and policies are part of the strategic intentions of the PDP, specifically seeking to manage the spatial layout of urban development in the District. The objectives and policies seek to provide a managed approach to urban development that utilises land resources in an efficient manner, and preserves and enhances natural amenity values.<sup>13</sup>

#### **Tangata Whenua Chapter 5:**

<b>Reference</b>	<b>Detail</b>
Objective 5.4.1	Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan.
Policy 5.4.1.1	Ensure that Ngāi Tahu Papatipu Rūnanga are engaged in resource management decision-making and implementation on matters that affect Ngāi Tahu values, rights and interests, in accordance with the principles of the Treaty of Waitangi.

<sup>13</sup> Provision 4.1 (Purpose), paragraph 2.

Policy 5.4.1.2	Actively foster effective partnerships and relationships between the Queenstown Lakes District Council and Ngāi Tahu Papatipu Rūnanga.
Policy 5.4.1.3	When making resource management decisions, ensure that functions and powers are exercised in a manner that takes into account iwi management plans.
Policy 5.4.2	Recognise that only tangata whenua can identify their relationship and that of their culture and traditions with their ancestral lands, water sites, wāhi tapu, tōpuni and other taonga.

6.21. The proposal gives effect to the Tangata Whenua Chapter 5 objectives and policies as it takes into account the relevant iwi management plans, and statutory consultation with iwi has occurred and no changes were requested.

### **Other Council Documents Considered**

6.22. The following Council documents and projects have informed this Section 32 evaluation.

- (a) Industrial and Business Zone Monitoring reports (2010, 2011)
- (b) My Place consultation report
- (c) Long Term Plan – Volume A
- (d) Long Term Plan – Volume B
- (e) Population Projections (December 2018)<sup>14</sup>
- (f) Queenstown Lakes Economic Development Strategy (February 2015)
- (g) DRAFT Frankton Master Plan<sup>15</sup>
- (h) Business Development Capacity Assessment (March 2018)<sup>16</sup>

6.23. Other documents:

- (a) Crime prevention through environmental design (CPTED)<sup>17</sup>

## **7. INTRODUCTION TO EVALUATION**

7.1. The following key issues have been identified as the central themes associated with the proposal.

- Issue 1 - Understanding the District's industrial economy

<sup>14</sup> <https://www.qldc.govt.nz/our-community/population-projections/>

<sup>15</sup> <http://www.qldc.govt.nz/assets/Uploads/Your-Council/Projects/Frankton-Masterplan/QLDC-Scuttlebutt-June19-Issue132-WEB-FRANKTON-MASTERPLAN-laid.pdf>

<sup>16</sup> Note supplementary comments made as part of the Topic 2 Rural Landscape appeal ENV-2018-331-000091 – Evidence In Chief Of Natalie Dianne Hampson For Queenstown Lakes District Council, Topic 2 – Rural Landscape, 12 October 2018

<sup>17</sup> Details of the 7 principles and their implementation can be found within the guidelines provided by the Ministry for Justice: National Guidelines for [Crime Prevention through Environmental Design in New Zealand: Part 1 Seven Qualities for Safer Places](#) National Guidelines for [Crime Prevention through Environmental Design in New Zealand: Part 2 Implementation Guide](#)

- Issue 2 - Non-industrial activities within the Industrial Zones
- Issue 3 - Industrial Development Capacity
- Issue 4 – What are the industrial land needs specific to Wanaka
- Issue 5 - Structure and complexity of the Industrial Zone framework
- Issue 6 - Minimum lot size within the Industrial Zones
- Issue 7 - Parking, manoeuvring and loading
- Issue 8 - Amenity within and outside of the Industrial Zones
- Issue 9 - Split zonings, inappropriate zoning layout and re-zonings

### **Issue 1 – Understanding the District’s industrial economy**

- 7.2. In order to create and administer an industrial zone framework it is important that the nature of the underlying industrial economy is well understood. The most recent monitoring work Council completed for industrially zoned land was in 2010 and 2011. Since this time, the nature and scale of the Zones has changed markedly. Once the characteristics of the industrial economy is understood, objectives, policies and methods can be developed that provide for the long term viability of those activities which comprise and support the industrial economy, and appropriately manage, restrict or exclude particular land uses which create conditions or restrictions that undermine the industrial economy.
- 7.3. Market Economics (**ME**) were engaged by the Council to provide an analysis of the nature of the District’s industrial economy. This analysis titled “Economic Assessment of Queenstown Lakes District’s Industrial Zones, Stage 3 of the District Plan Review, 22 May 2019 by ME (**the ME Assessment Report**) identifies and describes the District’s industrial economy and examines its structure, economic role, distribution, recent changes and projected future growth. This report has been attached to this evaluation as Appendix 1.
- 7.4. The ME Assessment Report found that the industrial economy of the Queenstown Lakes District is somewhat unique, comprising a mix of activities which differs from the national average and other districts of a similar population. The report outlines that the industrial economy is not especially influenced by trends happening at a national level and suggests the District requires a particular land use planning framework to manage activities and development within the GIZ and that this management framework will be different to that of adjoining authorities or within authorities of a similar size and economy.
- 7.5. The two wards described as making up the industrial economy are the Wakatipu Ward (comprising Queenstown and Arrowtown) and the Wanaka Ward. Overall, the ME Assessment Report outlines that the District’s industrial economy is *‘growing rapidly and has demonstrated growth*

*rates faster than the rest of the district's economy*'.<sup>18</sup> This rate of growth is expected to continue, but the structure and characteristics of the economy are not expected to change from what is observed today. The report describes a '*business as usual*'<sup>19</sup> outlook as being an appropriate way to guide land use planning for any review of the ODP Industrial Zones.

- 7.6. Section 2.1 of the ME Assessment Report describes the methodology used in defining the industrial economy. It applies the ANZSIC<sup>20</sup> industries classification, being the base standard for spatial economic analysis. It also looked beyond the Industrial Zones in defining the economy as the industrial economy does not simply exist within the Industrial Zones. Businesses operate outside of the Industrial Zones as other zones provide for the industrial type activities, a number have always operated "out of zone" and many choose not to, or are not able to find sites within the Industrial Zones.
- 7.7. Figure 1 below presents a summary of the District's industrial economy. It identifies 1,928 businesses and approximately 6,250 workers, representing 25% of all business in the District's economy in 2017 (7,710) and 22.5% of all workers (27,800).<sup>21</sup> The methodology outlines that the District's industrial economy is comprised of businesses involved in *Manufacturing; Construction; Waste Collection, Treatment and Disposal; Wholesaling; Road Transport; Delivery Services; Storage; Vehicle, Machinery and Equipment (construction related) Hire; Automotive, Appliance, Machinery and Equipment Repair and Maintenance Services; and industrial Dry Cleaning (non-retail component)*.<sup>22</sup> Appendix 1 of the ME Assessment Report provides a breakdown of the classifications and the types of activities that fall within these classification divisions.
- 7.8. Business that fall within the Construction 'division' (being the broadest aggregation in the ANZSIC framework) make up 61% of all businesses and 56% of all employment within the industrial economy, while manufacturing accounts for 12% of businesses and 14% of employment. Appendix 1 of the ME Assessment Report shows that the types of activities that fall within these two classifications would fall within the definitions of Industrial<sup>23</sup> or Service<sup>24</sup> activities. Manufacturing or fabricating or the provision of services and the wholesale trade division makes up 8% of businesses and 9% of employment.

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<sup>18</sup> Page 1 of the ME report

<sup>19</sup> Page 1 of the Me report

<sup>20</sup> Statistics New Zealand Business Directory data - Australia New Zealand Standard Industrial Classification 2006

<sup>21</sup> Page 9, Section 2.2 of the ME report

<sup>22</sup> Page 101, Section 7.1 of the ME report

<sup>23</sup> ODP definition - Means the use of land and buildings for the primary purpose of manufacturing, fabricating, processing, packing, or associated storage of goods

<sup>24</sup> ODP definition - Means the use of land and buildings for the primary purpose of the transport, storage, maintenance or repair of goods.



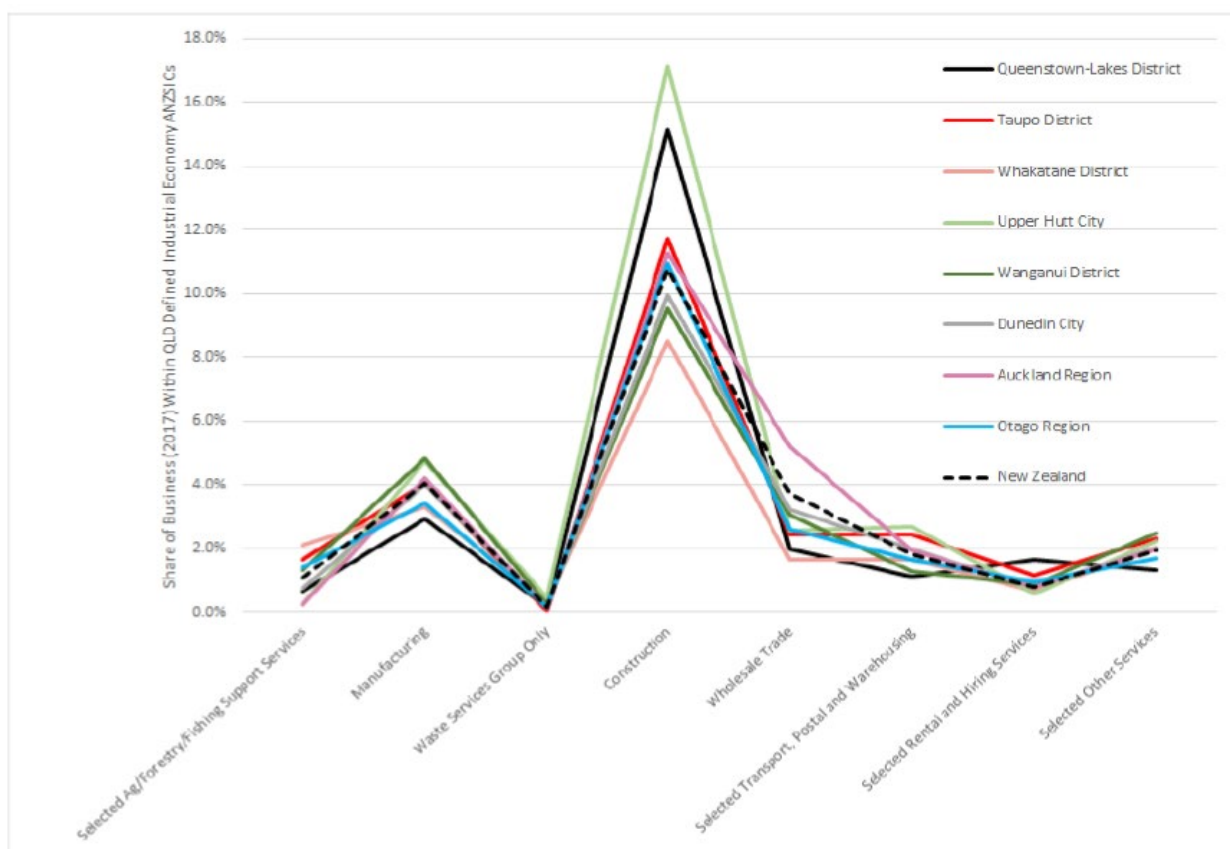
ANZSIC Division	Industrial Economy Selection	Business Count (n)	Share of IE Businesses (%)	Share of All Businesses (%)	Employment Count (n) *	Share of IE Employment (%)	Share of All Employment (%)	Average Business Size (MECs)
A	Selected Ag/Forestry/Fishing Support Services	50	2.6%	0.7%	130	2.1%	0.5%	3
C	Manufacturing	225	11.7%	2.9%	862	13.8%	3.1%	4
D	Waste Services Group Only	15	0.8%	0.2%	103	1.6%	0.4%	7
E	Construction	1,168	60.6%	15.2%	3,465	55.5%	12.5%	3
F	Wholesale Trade	154	8.0%	2.0%	573	9.2%	2.1%	4
I	Selected Transport, Postal and Warehousing	85	4.4%	1.1%	312	5.0%	1.1%	4
L	Selected Rental and Hiring Services	128	6.6%	1.7%	371	5.9%	1.3%	3
S	Selected Other Services	102	5.3%	1.3%	434	6.9%	1.6%	4
QLD Industrial Economy		1,928	100.0%	25.0%	6,249	100.0%	22.5%	3
Rest of QLD Economy (all other ANZSICs)		5,782		75.0%	21,551	344.9%	77.5%	4
Total QLD Economy		7,710		100.0%	27,800		100.0%	4

Source: M.E. Statistics NZ Business Frame 2017

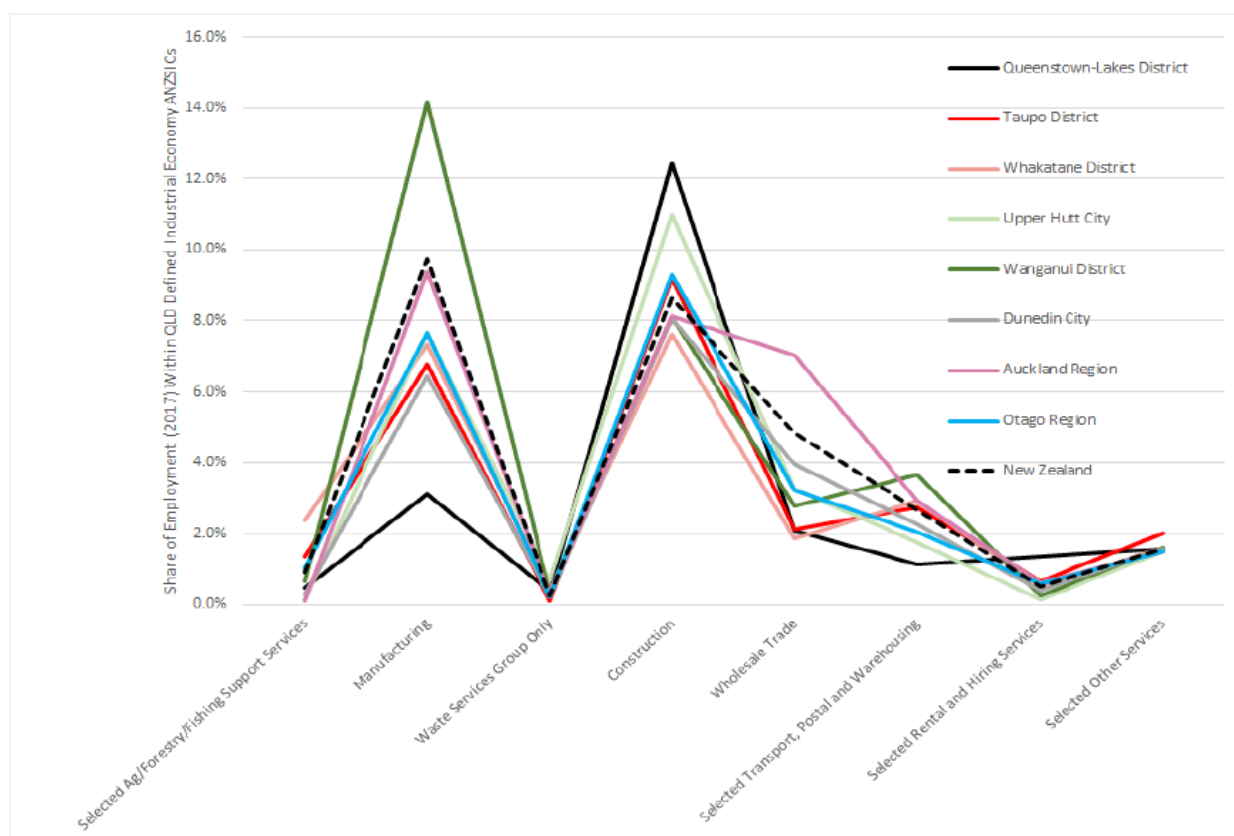
**Figure 1** – Summary of the District's industrial economy (ME Assessment Report)

- 7.9. Figures 2 and 3 below compare business counts and employment share of the District's industrial economy with selected other District's. They show that construction accounts for a relatively higher share of total selected businesses and that Wholesale Trade plays a lower relative role. The ME Assessment Report finds that this is consistent with the long distance of the District from sea or air freight ports (in terms of wholesaling imported products) or to a primary production hub.<sup>25</sup> This shows that the District is not well located to be a logistics (distribution) hub and that unsurprisingly it plays a relatively stronger role in selected businesses of Rental and Hiring Services (in an industrial or industrial service role) with the majority of these businesses sustained by Queenstown's tourism role.<sup>25</sup>

<sup>25</sup> Page 11, Section 2.3 of the ME report



**Figure 2** – Comparison of share of Businesses within the District's industrial economy (ME Assessment Report)



**Figure 3** – Comparison of share of employment within the District's industrial economy (ME Assessment Report)

7.10. The comparison of employment share further illustrates the small scale of District's Manufacturing base in employment terms and the significant role of Construction compared to elsewhere. In regard to manufacturing activities, the ME Assessment Report suggests that the District's manufacturing base is not what is typically found elsewhere, with a higher share of Beverage Product Manufacturing businesses, Non-Metallic Mineral Product Manufacturing, Transport Equipment Manufacturing and Furniture and Other Manufacturing businesses, and a relatively small role for Wood Product Manufacturing, Printing, Polymer/Rubber Product Manufacturing, Fabricated Metal Product Manufacturing, and Machinery and Equipment Manufacturing – all heavy or factory-based Manufacturing activities.<sup>26</sup>

7.11. The report describes the distinct roles played by the two Wards (Wakatipu and Wanaka) and compares this with Cromwell, which has historically been poorly understood.<sup>27</sup> The report found that the same two divisions tend to dominate across the Wards, being construction followed by manufacturing. However, business that employee larger numbers of people are present in Cromwell, as is indicated by the dominance of manufacturing and selected agricultural support services. Arrowtown is also indicated as having a relatively larger share of businesses that

<sup>26</sup> Page 13, Section 2.3, of the ME report

<sup>27</sup> Section 2.4 of the ME report

employ a greater number of people. In contrast, Queenstown and Wanaka have a larger share of businesses that employ a smaller number of people, indicating smaller businesses in these locations.<sup>28</sup>

- 7.12. The report's shows that Cromwell is much more focused on Agricultural support services, manufacturing, wholesale trade and selected transport, postal and warehousing compared to the District's two Wards, demonstrating that Cromwell is a more attractive location for businesses in Divisions which have a focus on freight movements. This is largely due to the transport benefits associated with this location as a central hub to a range of locations (including Queenstown, Wanaka, Dunedin and the route to Christchurch).<sup>29</sup> The report concludes that locational attributes mean Queenstown and Wanaka are not likely to compete with Cromwell for larger businesses in these sectors. Instead, smaller operators within these divisions with a local focus are more likely to occur within the District.<sup>29</sup>
- 7.13. The Assessment Report explores how dependent or independent each ward is of the other in order to inform how much Queenstown's industrial economy "serves" Wanaka, and vice versa, and how much Cromwell "serves" the District's industrial economy. It found that those businesses which comprise the District's industrial economy are mostly duplicated between the Queenstown and Wanaka Wards, supporting a degree of independence and self-sufficiency between the Wards.<sup>30</sup> It also found that most industrial economy businesses operating within Cromwell are replicated within the Queenstown Lakes District's industrial economy.<sup>31</sup> This also supports the notion that there is no clear need to have different land use rules apply across the different Zones as occurs at present and that it would be efficient and effective to apply a single zoning framework. The report describes the upstream and downstream linkages between Queenstown-Wanaka-Cromwell as an 'economic triangle'<sup>32</sup> which shows that there is more supply chain related demand linkage between the two separate Ward business economies with the wider Otago area than there is between the Wanaka and Queenstown Wards.
- 7.14. Adding to this context, the report describes how '*a significant 65% of QLD industrial economy output is consumed (purchased) within the district. In other words, a significant share of output is produced to meet local demand*'<sup>33</sup> demonstrating that the industrial economy is largely sustained by local demand. Of this local demand, just 6% is supplied directly to households (which includes

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<sup>28</sup> Page 19, Section 2.3 of the ME report

<sup>29</sup> Page 20, Section 2.3 of the ME report

<sup>30</sup> Page 24, Section 2.5 of the ME report

<sup>31</sup> Page 21, Section 2.5 of the ME report

<sup>32</sup> Page 29, Section 3.3 of the ME report

<sup>33</sup> Page 27, Section 3.2 of the ME report

domestic visitors)<sup>33</sup> indicating that only a small proportion of business within the industrial economy sell their products and services directly to the public.

7.15. Two key questions are raised and answered in assessing linkages between the wards<sup>34</sup>:

*'Does the Wanaka industrial economy help service the needs of the Queenstown/Arrowtown market at present? The answer to that question is: to a very limited extent.'*

*'Would the Wanaka industrial economy be able to play a greater role in meeting the needs of the Queenstown/Arrowtown market in the future? The answer to that question is: highly unlikely, based on current industrial economy supply and demand relationships. For the large part, both catchments are focussed on supplying local demand.'*

7.16. Section 4 of the Assessment Report assess the land use and locational requirements of businesses which make up the industrial economy. It shows that 82% of businesses in the industrial economy and that 85% of all industrial economy employment is located within the urban environment.<sup>35</sup> Within the urban environment, the largest proportion of industrial businesses are located within zones other than the ODP Industrial Zones, with 57% being located within residential zones.<sup>36</sup> This is however dominated by sole trade construction businesses who choose to run their businesses from home. It is not likely that actual industrial activities are being undertaken from these sites within residential zones. The Industrial Zones<sup>37</sup> are said to account for between 5% and 13% of all industrial economy businesses, however industrial economy businesses account for 42% of all businesses in these areas (meshblocks) demonstrating that there is a significant proportion of businesses operating within these zones which do not fall within the industrial economy.<sup>38</sup> Figure 4 below shows the mix of industrial economy businesses within each of the meshblock zone groups.

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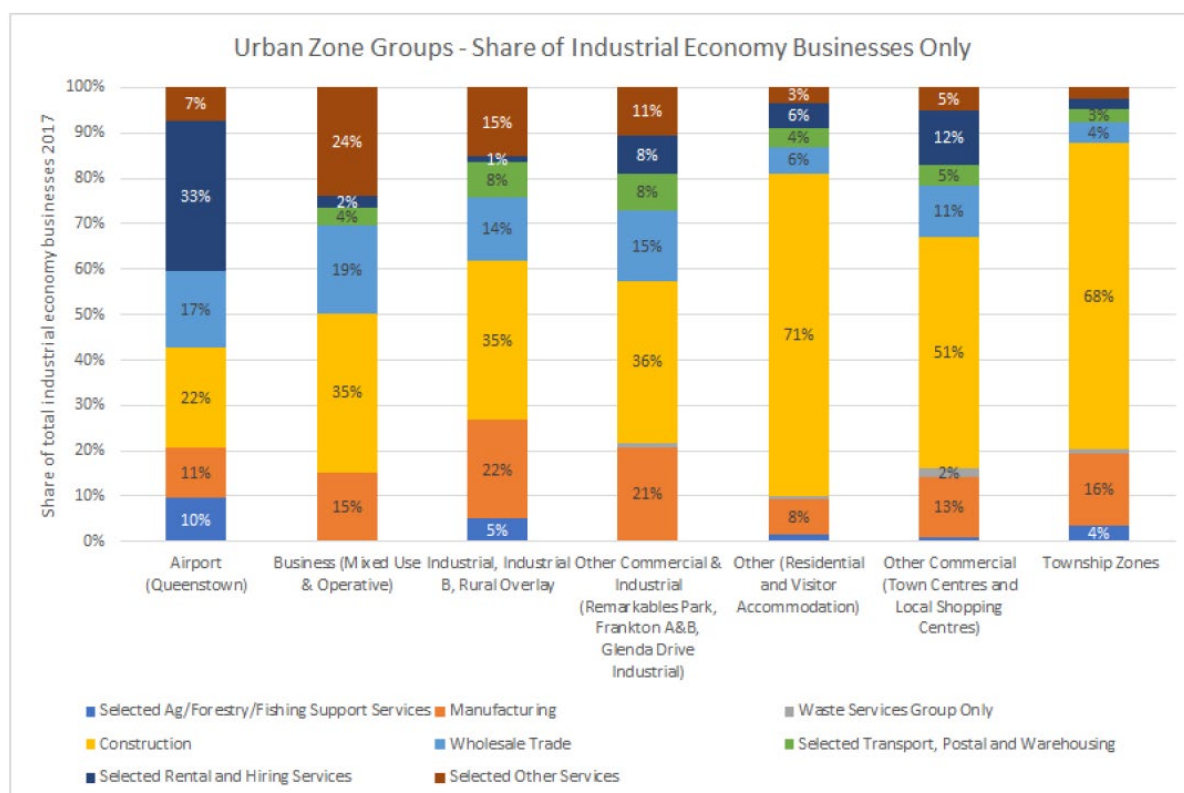
<sup>34</sup> Page 26, Section 3.3 of the ME report

<sup>35</sup> the adopted urban-rural environment matches that used for the Council's Business Development Capacity Assessment 2017 under the NPS – UDC

<sup>36</sup> Page 40, Section 4.3 of the ME report

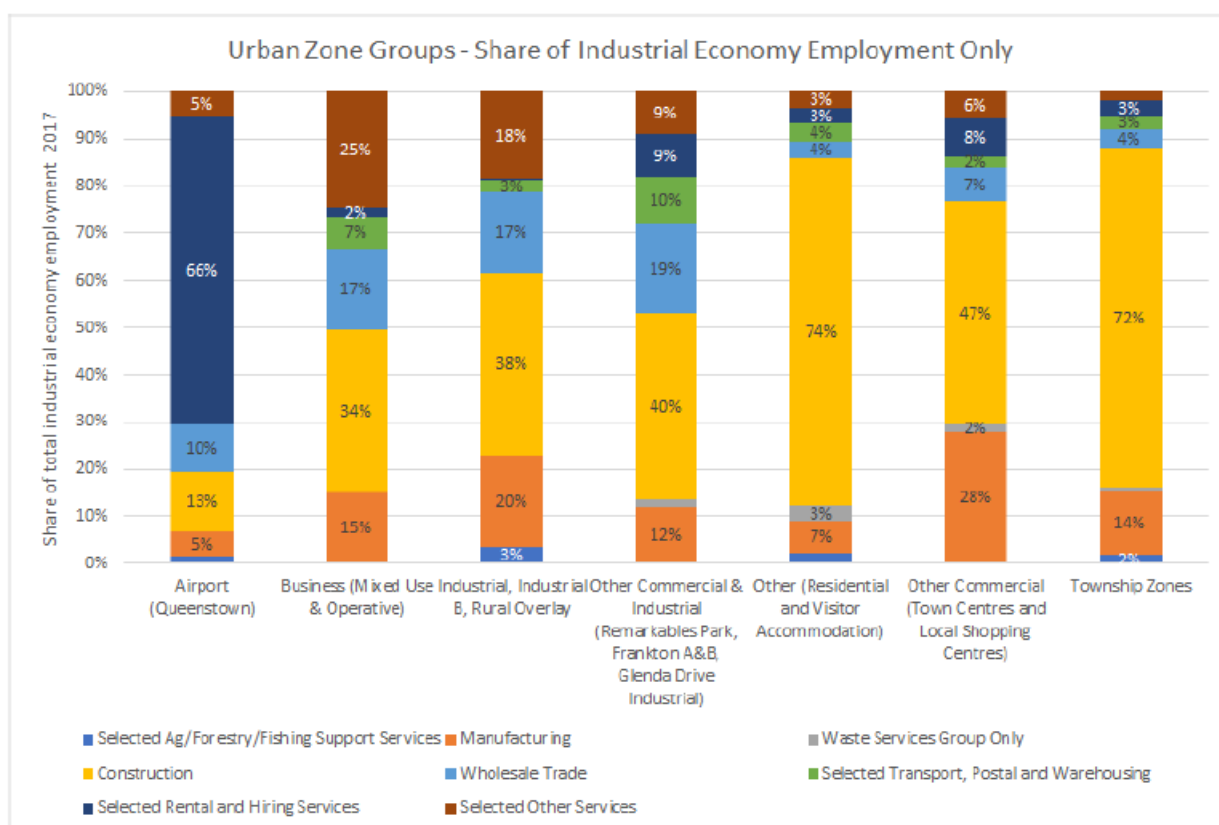
<sup>37</sup> Comprising the Industrial and Industrial B zones with the exception of Glenda Drive (which can't be separated) and includes the small Industrial zone in Luggate. Note the discussion within the ME report in regard to the limitations of the Meshblock data.

<sup>38</sup> Page 41, Section 4.3 of the ME report



**Figure 4** – Share of Urban Industrial Economy Businesses by Broad Zone Group (ME Assessment Report)

7.17. Figure 4 above shows a similar mix of industrial economy businesses between the industrial group of zones and the other commercial group of zones. The dominance of the construction figure within the other residential zone group is due to sole trade construction workers registering their business to their home.

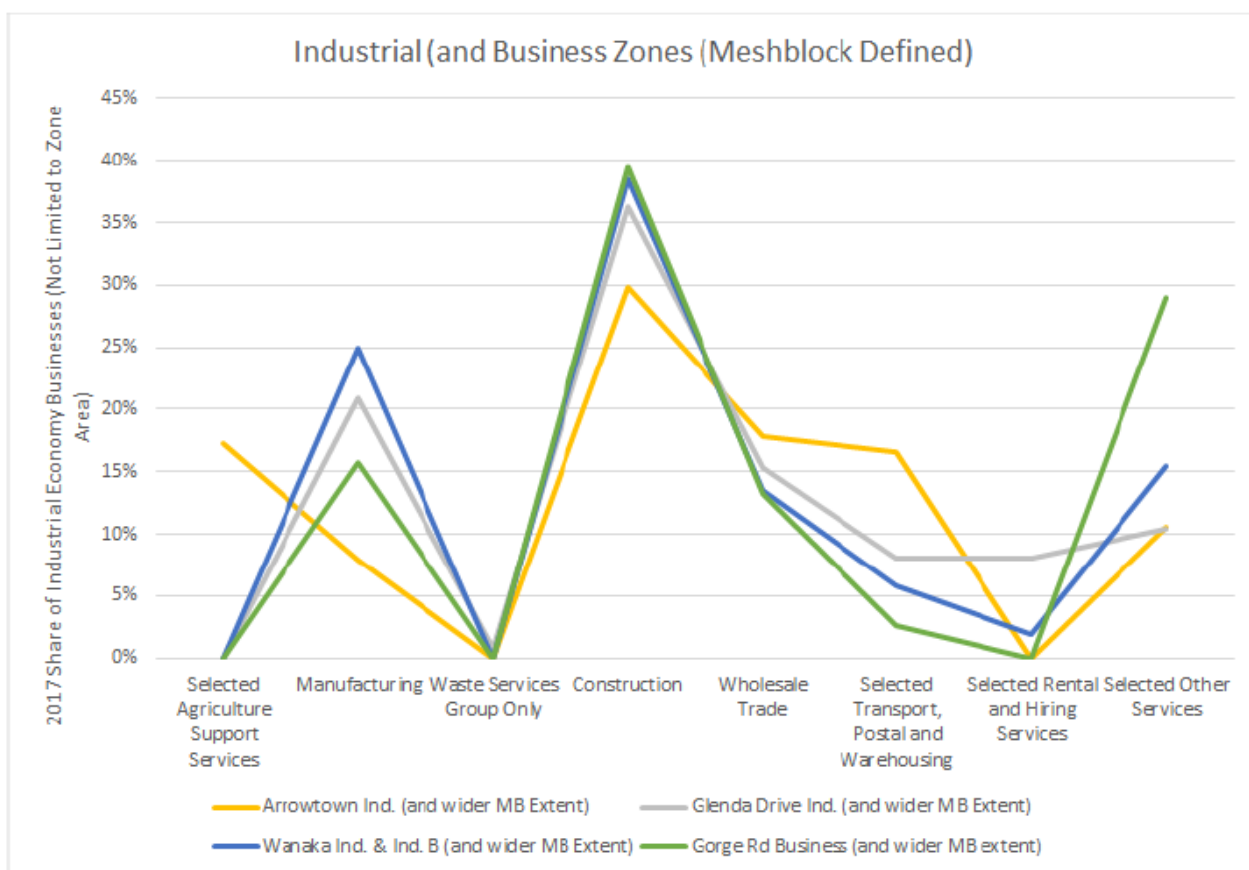


**Figure 5 – Share of Urban Industrial Economy Employment by Broad Zone Group (ME Assessment Report)**

- 7.18. Figure 5 above shows that the profile of employment is broadly similar to the profile of businesses in each zone group. However, it shows that Rental and Hiring Services within the Airport Zone in Queenstown are larger relative to the others in the industrial economy, and that the Transport, Postal and Warehousing Division in the Industrial zone group illustrates the presence of storage companies that have low numbers of staff.<sup>39</sup>
- 7.19. Figure 6 below compares the Industrial Zones in terms of the count of businesses that are included within the industrial economy. This shows that the mix of businesses between the zones is very similar, again supporting a single zone framework approach across the District. The Arrowtown Industrial Zone is more unique as it is a smaller zone that will struggle to support a diverse range of businesses.<sup>40</sup>

<sup>39</sup> Page 44, Section 4.3 of the ME report

<sup>40</sup> Page 57, Section 4.5 of the ME report



**Figure 6** – Share of industrial economy businesses within the Industrial Zones (ME Assessment Report)

7.20. Section 5 of the Assessment Report provides insights on changes to the industrial economy in terms of size and structure. It shows that between 2001 and 2006 the industrial economy grew by 102%, being a faster rate of growth than the rest of the District's economy.<sup>41</sup> The global financial crisis in 2008 significantly slowed growth between 2006 and 2013, during which time the industrial economy grew by just 9%. Between 2013 and 2017 however the industrial economy grew by 19%. The construction sector has grown the most since 2001. Growth within the construction sector means that the District's industrial economy is becoming slightly less diverse as observed in the period between 2001 – 2017.<sup>42</sup> Overall, the report suggests that the District's industrial economy is not changing in the same way as New Zealand's total industrial economy. Heavy Machinery and Scaffolding Rental and Hiring businesses have been identified as those activities within the District's economy which have experienced continued decline.<sup>43</sup> The analysis shows that Wanaka's industrial economy has grown much faster than the District's average, with Wholesale Trade and Transport, Postal and Warehousing Divisions showing the fastest growth

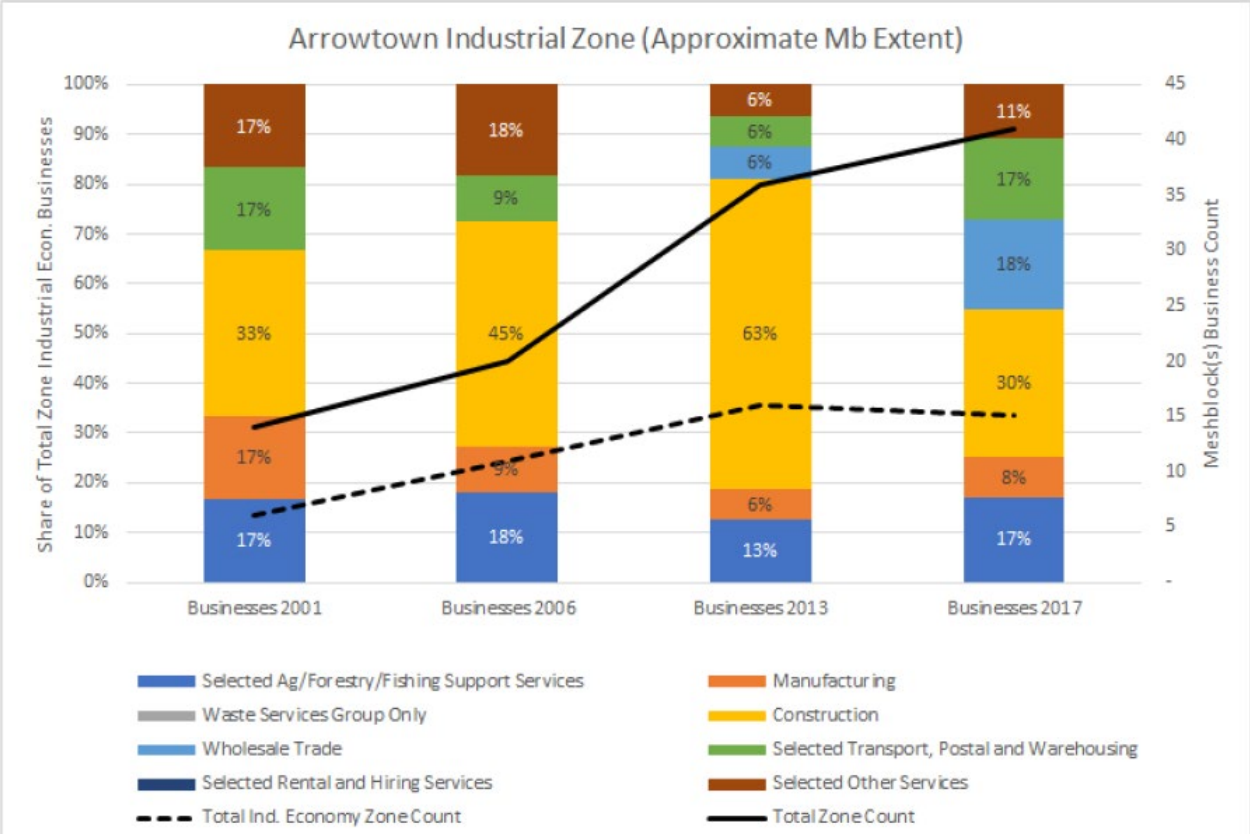
<sup>41</sup> Page 60, Section 5.1 of the ME report

<sup>42</sup> Page 64, Section 5.2 of the ME report

<sup>43</sup> Page 68, Section 5.6 of the ME report

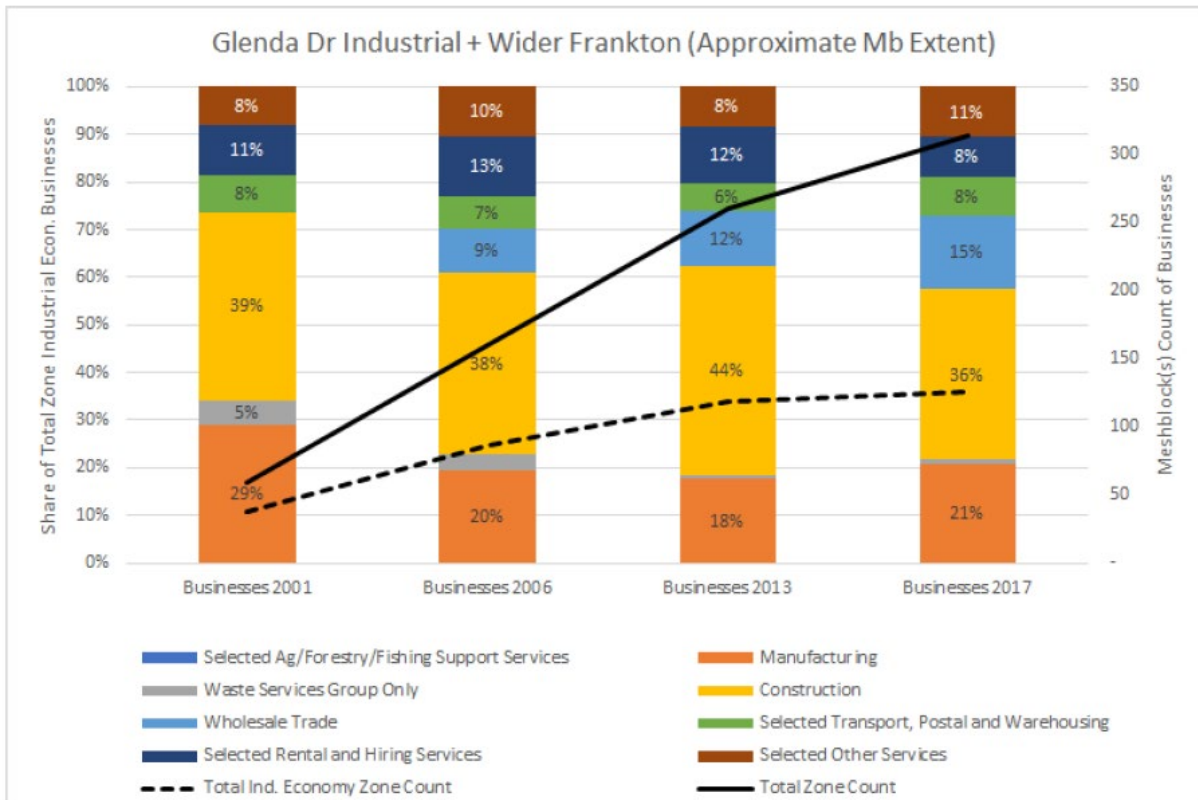


rate although the Construction division has still experienced the largest increase in business counts.<sup>44</sup> The rate of growth within the Queenstown Ward is below the District average, but faster than the rest of the District's economy, with the fastest growing sectors being Transport, Postal and Warehousing.<sup>45</sup> Figures 6 – 8 below illustrate changes in industrial economy business counts within each of the Industrial Zones<sup>46</sup> between 2001 and 2017.

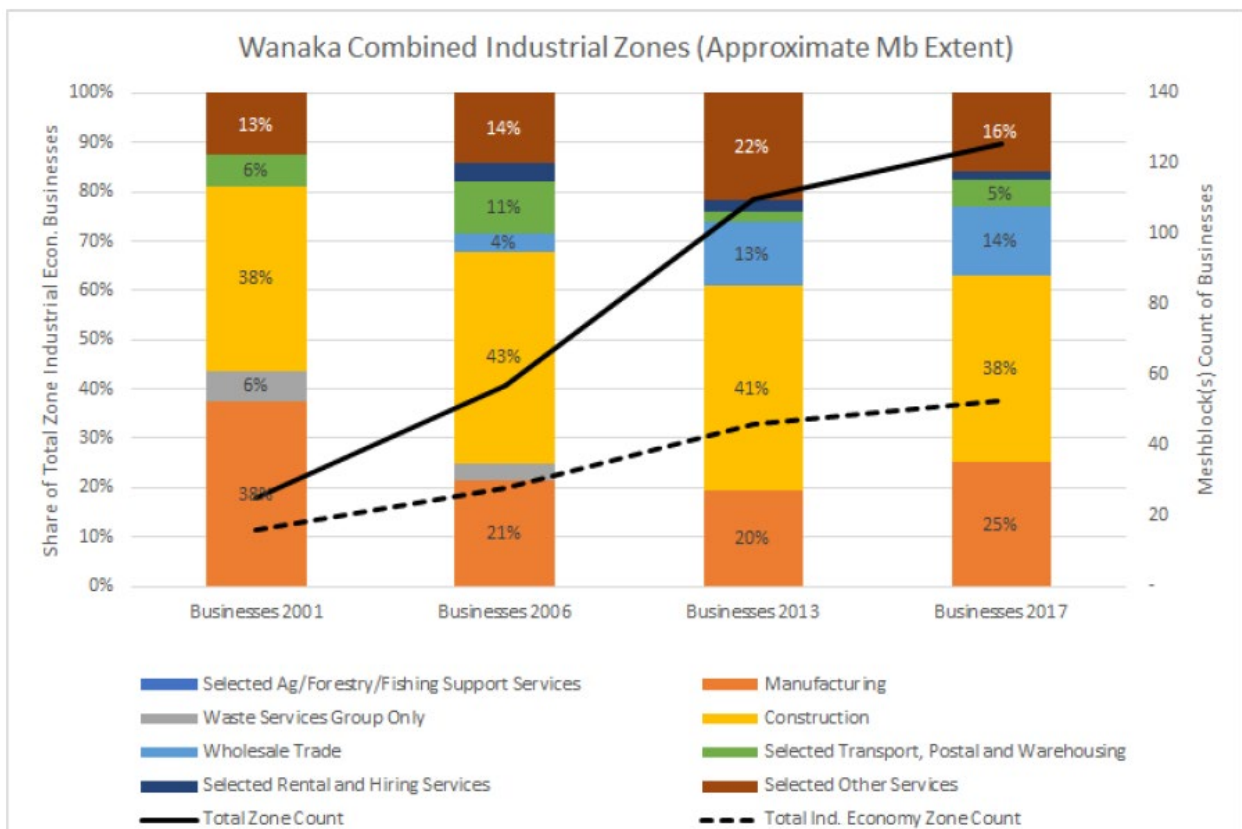


**Figure 6 – Arrowtown Industrial Zone changes in industrial economy business counts (ME Assessment Report)**

<sup>44</sup> Page 69, Section 5.8 of the ME report  
<sup>45</sup> Page 71, Section 5.8 of the ME report  
<sup>46</sup> Subject to meshblock extent



**Figure 7** – Glenda Drive Industrial Zone changes in industrial economy business counts (ME Assessment Report)



**Figure 8** – Wanaka Industrial Zones changes in industrial economy business counts (ME Assessment Report)

7.21. The Assessment Report suggests a business as usual growth outlook is likely moving into the future. The fact that the economy largely relies on a small scale domestic market which has a limited access to the industrial labour pool along with constrained freight and logistics characteristics which are reliant on road transport means that the District's industrial economy is not expected to move towards large scale industrial activities.<sup>47</sup> Instead, manufacturing will continue to be limited to businesses supplying local consumers and service oriented industrial activities, particularly for the construction sector. In addition, food and beverage sector growth associated with wine and craft beer production/bottling could place demand on the Industrial Zones.<sup>48</sup>

## **Issue 2 - Non-industrial activities within the Industrial Zones**

7.22. A series of ground truthing site visits were completed in January 2019 to assist in understanding the type of activities occurring 'on the ground' within the ODP Industrial Zones. This exercise sought to identify the actual mix of activities being undertaken on individual sites within the Industrial Zones according to ODP definitions. This adds to the understanding of the industrial economy as the ANZSIC classification used in the ME Assessment report refers to a business type, but not the operational/functional form of that business. The ANZSIC classification does not indicate if a House Construction business, for example, operates out of an office, a yard or is a self-employed tradesman that has no physical premises.<sup>49</sup>

- a. During the ground truthing site visits, observations of the uses on specific sites and/or units as well as signage were recorded. Desktop analysis of websites associated with specific businesses was also undertaken in order to refine the accuracy of observed activities. Site visits also sought to identify if any form of residential activities were present on the sites. Activities were recorded according to their observed predominance on a site or unit. As such, activities were recorded as being either 'predominant', or 'ancillary'. In many cases, it was necessary to record two layers of ancillary activities such that 'ancillary 1' and 'ancillary 2' activities are identified. The two layers of ancillary activities do not have any importance over each other.

## **Arrowtown Industrial Zone**

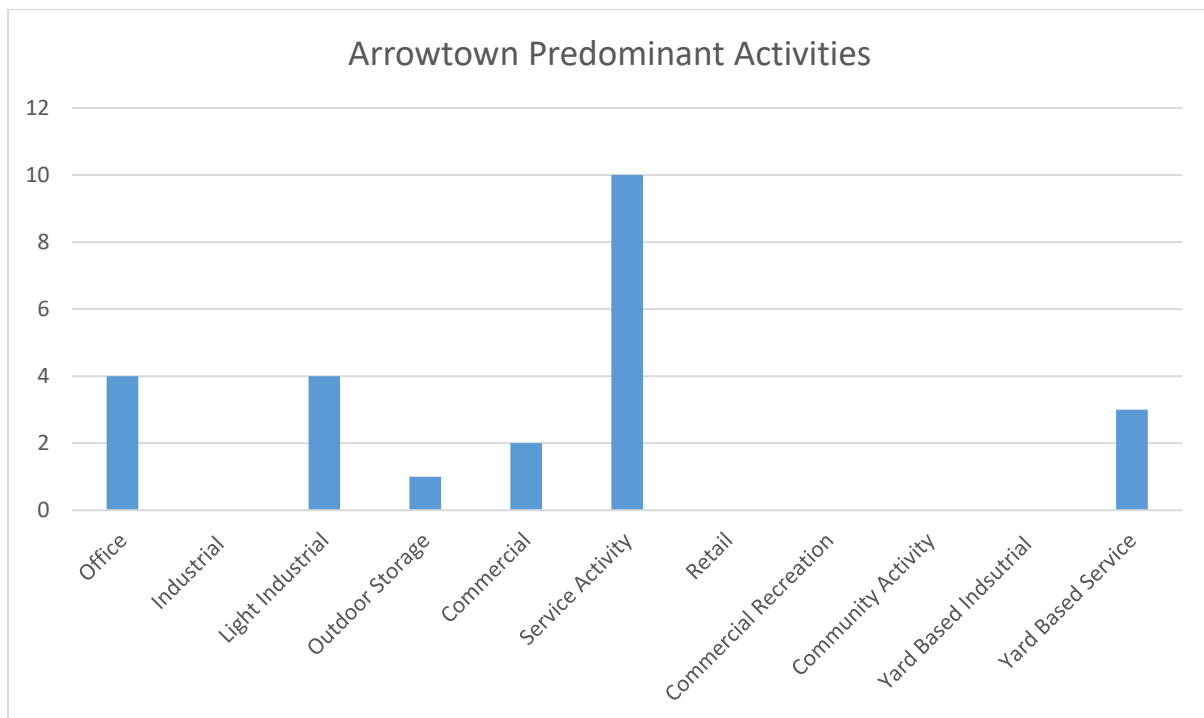
7.23. Figures 9 - 10 and Table 2 below illustrate the findings of the ground truthing for the Arrowtown Industrial Zone.

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<sup>47</sup> Page 87, Section 6.2 of the ME report

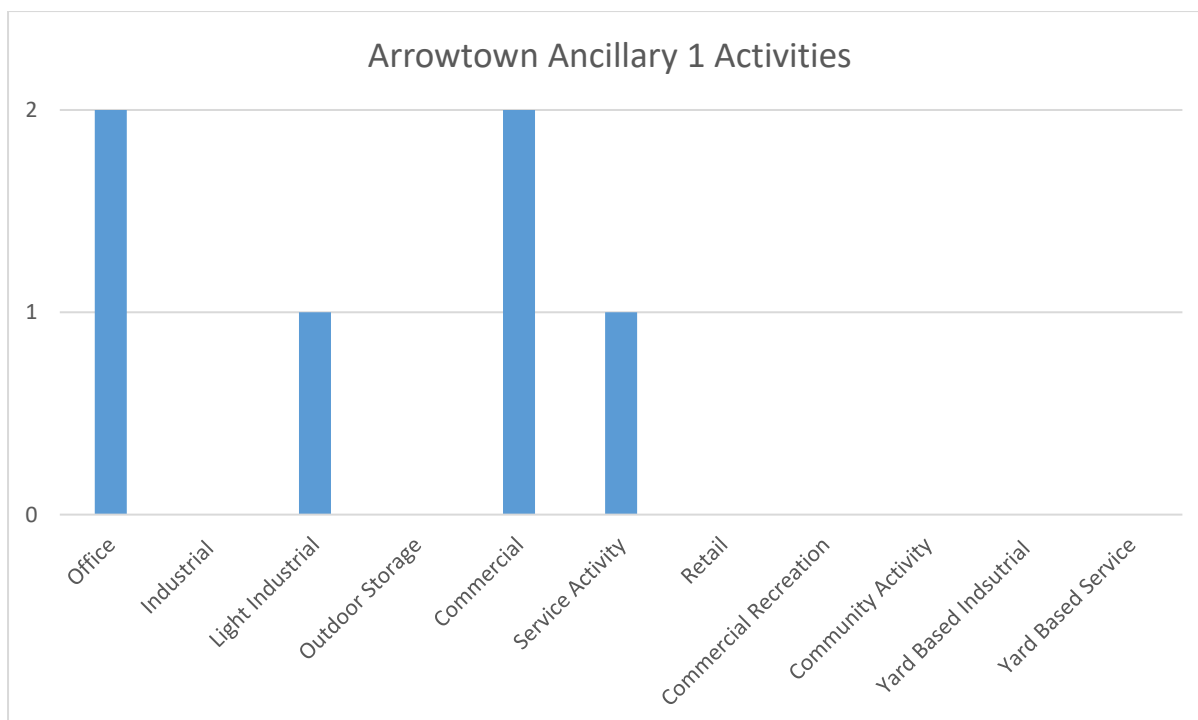
<sup>48</sup> Page 86, Section 6.2 of the ME report

<sup>49</sup> Page 4, Section 1.2 of the ME report



**Figure 9** – Predominant activates within the Arrowtown Industrial Zone

Activity	Total	%
Office	4	16.7
Industrial		
Light Industrial	4	16.7
Outdoor Storage	1	4.2
Commercial	2	8.3
Service Activity	10	41.7
Retail		
Commercial Recreation		
Community Activity		
Yard Based Industrial		
Yard Based Service	3	12.5
Total	24	100.0



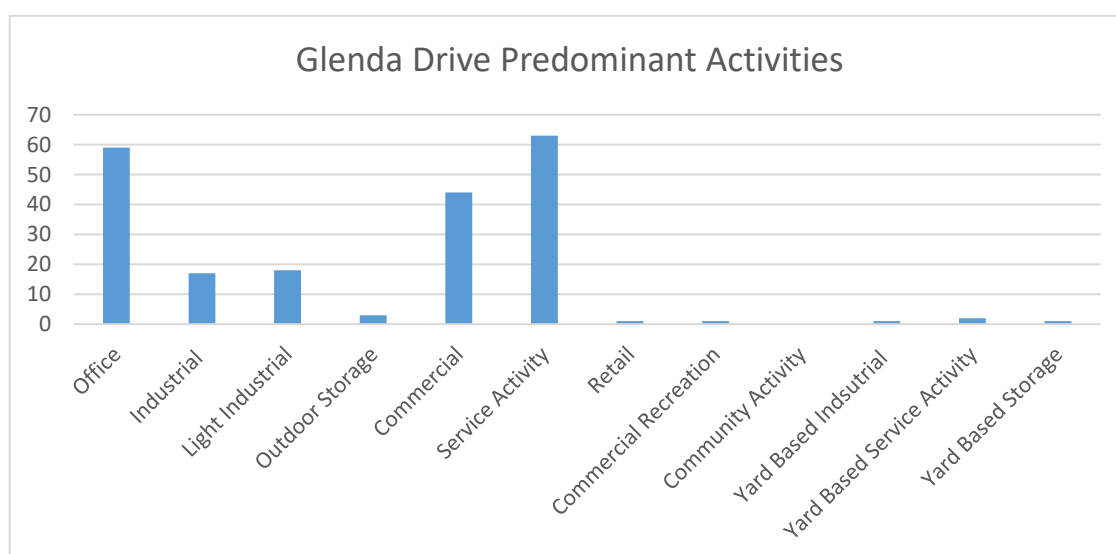
**Figure 10** – Ancillary activities within the Arrowtown Industrial Zone

- 7.24. Service Activities were the most common type of predominant activity within the Zone, comprising 41.7% of all predominant activities. These Service Activities did not appear to rely heavily on ancillary activities with only two of the observed Service Activities having an ancillary activity, one being an Office and the other being a Commercial activity.
- 7.25. Light Industrial and Office activities were the second most common type of predominant activity, each representing 16.7% of all businesses. Only two of the four Light Industrial activities had observed ancillary activities, one being a Service Activity the other being an Office. There were no second level ancillary activities observed within the Zone.
- 7.26. A significant area of the zone is occupied by three Yard Based Service Activities. These activities occupy approximately 1.82 ha of the total 3.67 ha of land that comprises the zone, or 49.6% of the total land area.
- 7.27. The Zone appears to have a relatively high presence of residential activities, with 44.4% of all predominant activities either having a residential element or being the predominant activity on the site. This comprised a mix of older standalone dwellings on the eastern side of Bush Creek Road, as well as flat type units located above other uses in a comprehensive type two level development located on the western side of Bush Creek Road. It also is important to note that the Zone adjoins an area of Lower Density Suburban Residential Zone to the east and a number of residential dwellings to the west that are located within the Meadow Park Special Zone.

7.28. Overall, the zone appears to have a strong industrial character, with 75.1% of all observed predominant activities being those more traditional industrial uses (Light Industrial, Outdoor Storage, Service Activities and Yard Based Service activities). Further, these industrial type activities do not appear to rely heavily on other non-industrial related activities.

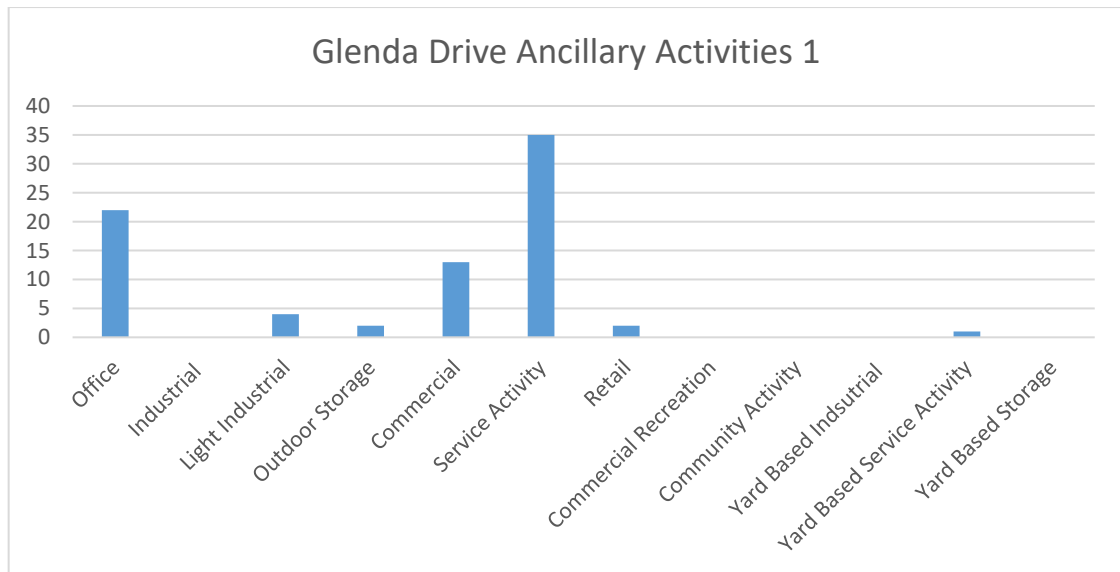
### Glenda Drive Industrial Zone

7.29. Figures 11 – 13 and Table 3 below illustrate the ground truth findings for the Glenda Drive Industrial Zone.

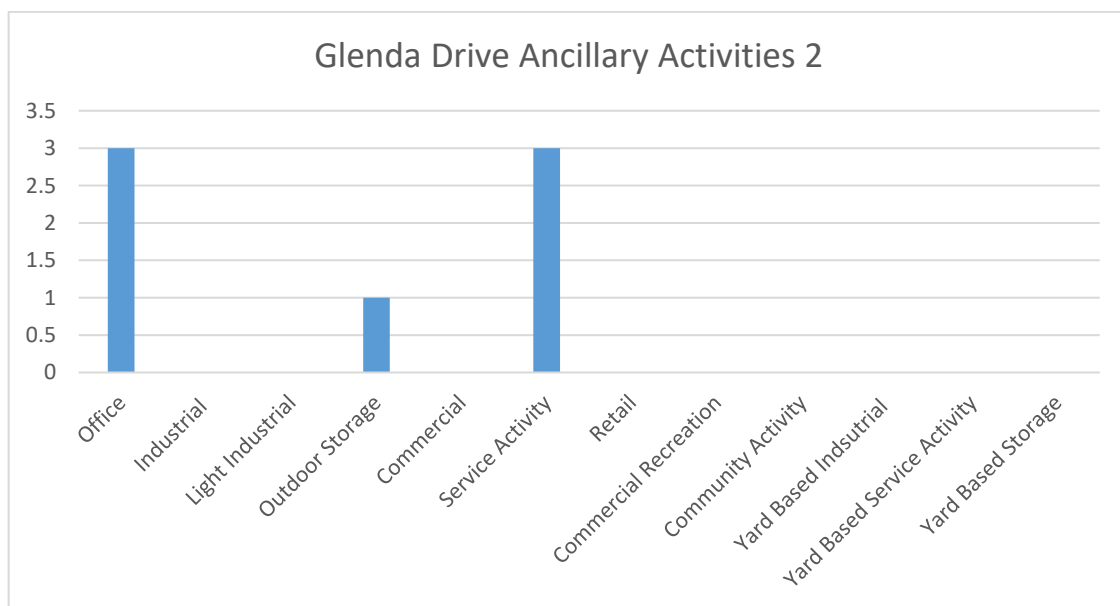


**Figure 11** – Predominant activates within the Arrowtown Industrial Zone

<b>Table 3 - Predominant activates within the Glenda Drive Industrial Zone</b>		
Activity	Total	%
Office	59	28.1
Industrial	17	8.1
Light Industrial	18	8.6
Outdoor Storage	3	1.4
Commercial	44	21.0
Service Activity	63	30.0
Retail	1	0.5
Commercial Recreation	1	0.5
Community Activity		0.0
Yard Based Industrial	1	0.5
Yard Based Service Activity	2	1.0
Yard Based Storage	1	0.5
Total	210	100.0



**Figure 12** – First level ancillary activities within the Glenda Drive Industrial Zone



**Figure 13** – Second level ancillary activities within the Glenda Drive Industrial Zone

7.30. Service activities are the most common type of predominant activity within the Glenda Drive Industrial Zone comprising 30% of all observed predominant activities. Office activities were the second most common predominant activity comprising 28.1% of activities and Commercial activities were identified as the third most common predominant activity comprising 21% of all activities. Together, Service activities, Offices and Commercial activities make up 79.1% of observed predominant activities. Interestingly, the predominant Office and Commercial activities together make up 49.1% of all predominant activities. Predominant industrial type activities<sup>50</sup>

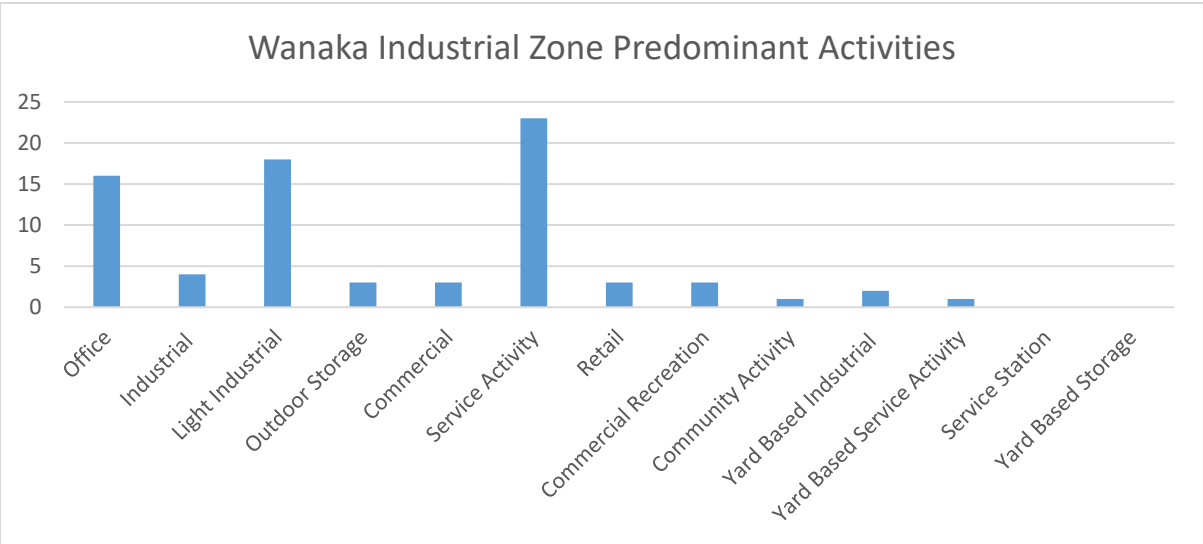
<sup>50</sup> Made up of industrial, light industrial, outdoor storage, service activities, yard based industrial, yard based service activity and yard based storage in this instance.

accounted for 50.1% of all predominant activities. This suggests that the Glenda Drive Industrial Zone is not predominately industrial in character, but rather has a wide mix of activities operating side by side.

- 7.31. There were 79 business (representing 37.6% of all observed businesses) that were observed as having a first level ancillary activity and of these, 7 businesses were identified as having an additional/second level ancillary activity. The makeup of ancillary activities mirrors that of predominant activities. In particular, the most common type of first level ancillary activity was Service activities, comprising 30%, followed by Offices, comprising 28.1%, and then Commercial activities, comprising 21%. In terms of the second level ancillary activities, three Offices, three Service activities, and one Outdoor Storage activity was observed. This indicates that more than a third of business operating within the Glenda Drive Industrial Zone operate more than one activity.
- 7.32. The Zone appears to have a modest presence of residential activities, with 26% of all observed business having an associated residential element. This equates to 12.4% of all businesses recorded. A large proportion of these residential elements were associated with comprehensive developments whereby a large number of two storey units were developed at the same time.

**Wanaka Industrial Zone**

- 7.33. Figures 14 - 16 and Table 4 below illustrate the ground truth findings for the Wanaka Industrial Zone.

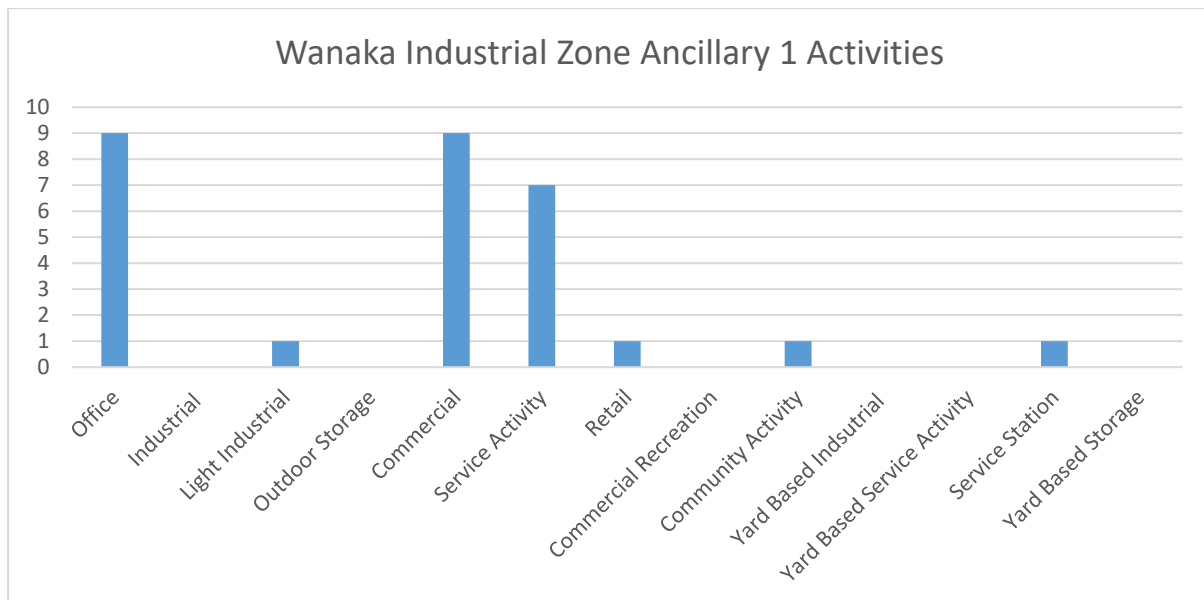


**Figure 14** – Predominant activates within the Wanaka Industrial Zone

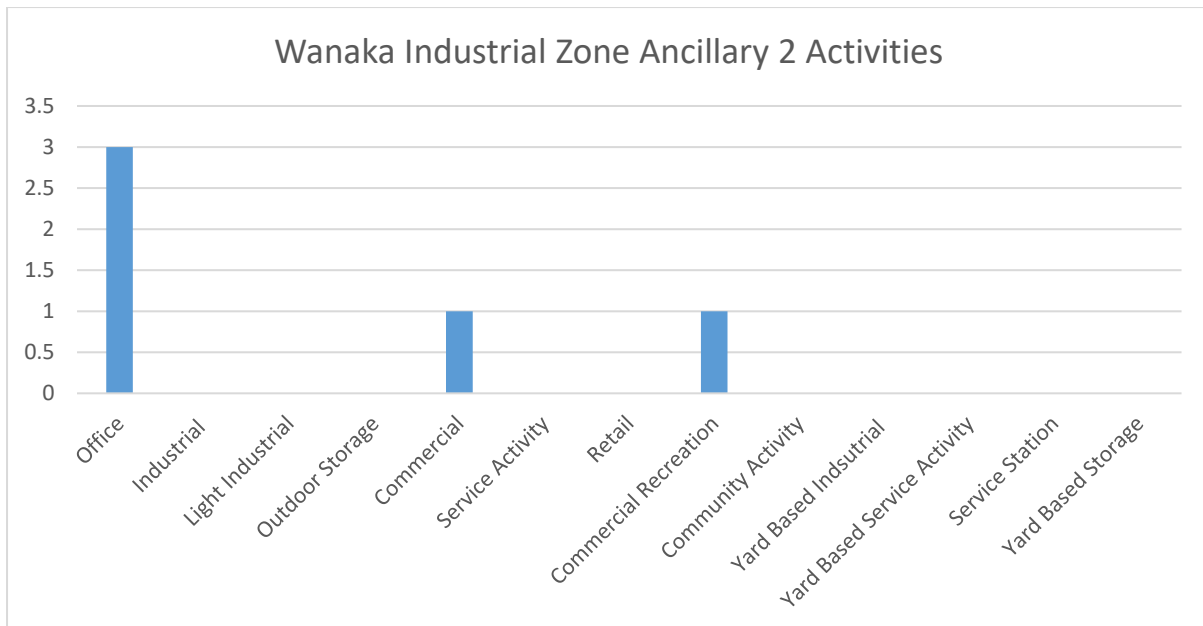
Table 4 - Predominant activates within the Glenda Drive Industrial Zone		
Activity	Total	%



<b>Office</b>	16	20.8
<b>Industrial</b>	4	5.2
<b>Light Industrial</b>	18	23.4
<b>Outdoor Storage</b>	3	3.9
<b>Commercial</b>	3	3.9
<b>Service Activity</b>	23	29.9
<b>Retail</b>	3	3.9
<b>Commercial Recreation</b>	3	3.9
<b>Community Activity</b>	1	1.3
<b>Yard Based Industrial</b>	2	2.6
<b>Yard Based Service Activity</b>	1	1.3
<b>Service Station</b>		0.0
<b>Yard Based Storage</b>		0.0
<b>Totals</b>	77	100.0



**Figure 15** – First level ancillary activities within the Wanaka Industrial Zone



**Figure 16** – Second level ancillary activities within the Wanaka Industrial Zone

7.34. Service activities are the most common type of predominant activity comprising 29.9% of all predominant activities observed within the Zone. Light Industrial activities were the second most common predominant activity comprising 23.4% of activities. Together, these activities represent 53.3% of all recorded predominant activities within the Zone. However, a large proportion of Office activities were also observed, representing 20.8% of all recorded predominant activities. Other non-industrial activities<sup>51</sup> within this Zone made up 13% of all recorded predominant activities. These observations suggest that, while the Wanaka Industrial Zone is largely industrial in character, other non-industrial activities are also well represented.

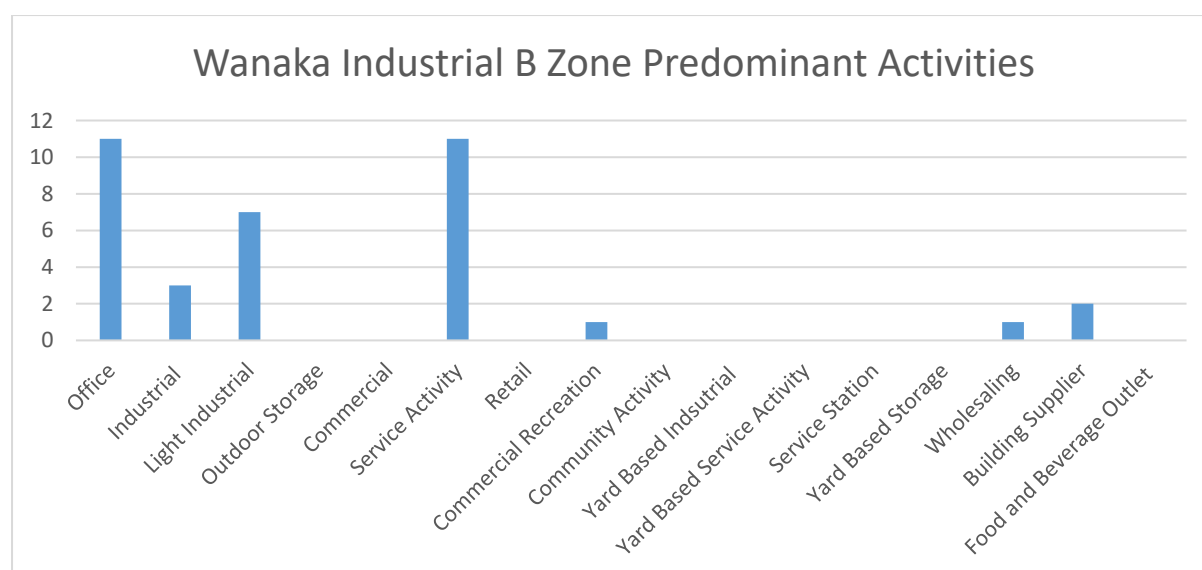
7.35. There were 29 businesses observed as having first level ancillary activities and 9 businesses having second level ancillary activities. Again, this represents more than a third of all predominant activities. The most common type of first level ancillary activities were Office (31%) and Commercial (31%) activities, together comprising 62% of all observed first level ancillary activities. Office activities was also observed as being the most common second level ancillary activity.

7.36. There were 12 businesses recorded as having a residential element, being 15.6% of all recorded businesses.

## Wanaka Industrial B Zone

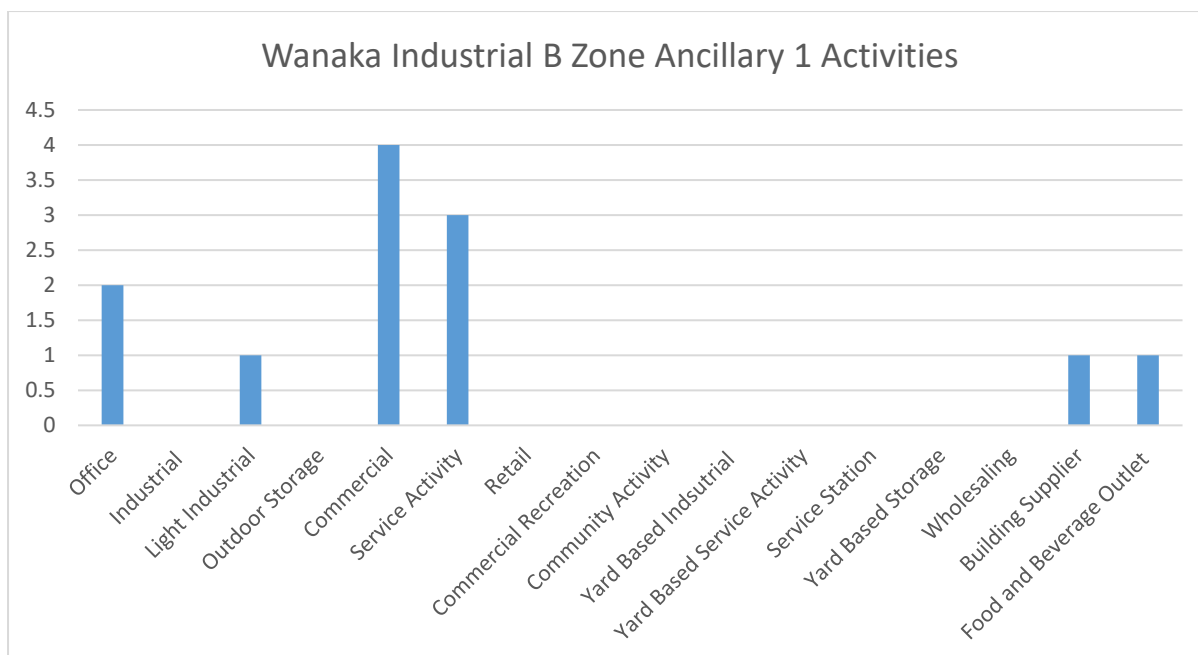
<sup>51</sup> Commercial, Commercial Recreation, Retail, and Community Activity

7.37. Figures 17 - 18 and Table 5 below illustrate the ground truthing findings for the Wanaka Industrial B Zone.



**Figure 17** – Predominant activities within the Wanaka Industrial B Zone

Activity	Predominant	%
Office	11	30.6
Industrial	3	8.3
Light Industrial	7	19.4
Outdoor Storage		0.0
Commercial		0.0
Service Activity	11	30.6
Retail		0.0
Commercial Recreation	1	2.8
Community Activity		0.0
Yard Based Industrial		0.0
Yard Based Service Activity		0.0
Service Station		0.0
Yard Based Storage		0.0
Wholesaling	1	2.8
Building Supplier	2	5.6
Food and Beverage Outlet		0.0
Totals	36	100.0



**Figure 18** – First level ancillary activities within the Wanaka Industrial B Zone

- 7.38. Service and Office activities were recoded as being the most common type of predominant activities within the Wanaka Industrial B Zone, each representing 30.6% of all predominant activities recorded. Light Industrial activities were observed as being the second most predominant activity, representing 19.4% of all activities. Together, the recorded Service and Light Industrial activities, being the 'industrial type' activities, along with recorded Industrial activities (representing 8.3% of activities) comprise 58.3% of all recorded activities. As is the case with the Wanaka Industrial Zone, while the Industrial B Zone is largely industrial in character, other non-industrial activities also occupy a large proportion of sites.
- 7.39. Twelve businesses within the Industrial B Zone were recorded as having first level ancillary activities and just a single business was recorded as having a second level ancillary activity. Of the first level ancillary activities, Commercial was the most common (representing 33.3% of all activities) followed closely by Service activities and Office activities (representing 25% and 16.6% respectively). The single first level ancillary activity was observed as being an Office activity.
- 7.40. Only three businesses within the Industrial B Zone were observed as having a residential element.
- 7.41. The ground truthing analysis supports the findings of the Assessment Report in regard the type of activities which comprise our industrial economy. In particular, it highlights that much of the observed industrial type activities operating within the Zone are those that would fall within the definition of Industrial activity or Service activity.
- 7.42. The ground truthing also demonstrate that the ODP provisions have not been effective or efficient in ensuring that the Industrial Zones provide a secure location for the establishment, operation

and growth of Industrial and Service Activities. Rather, they have provided for the infiltration of non-industrial activities throughout the Zones, in particular, Office, Retail and Commercial activities. Further, the analysis outlines that ancillary activities are common among businesses operating within the Industrial Zones, in particular, ancillary Office, Retail and Commercial type activities.

- 7.43. While residential elements are present within the Industrial Zones, they are not strikingly common. Most of the residential elements observed formed part of comprehensively developed two story sites, with the residential element being located at first floor level. The ground truthing observations do not suggest that these residential elements comprised custodial type flats or that they are associated with any Industrial or Service activity. No Industrial or Service activities were observed within the Industrial Zones that would require a custodial type residential element to be located on the same site as is provided for currently by the ODP Business and Industrial Zone provisions. The Assessment Report supports this, indicating that the District does not contain the types of larger businesses that might seek a need to accommodate staff on the same site as the activity is being undertaken. In many cases, the first floor levels of those comprehensive two storey developments were being occupied by Office, Retail or Commercial type activities as opposed to residential uses.
- 7.44. The large proportion of non-industrial type land uses located within the Industrial Zones presents issues for the long term viability of those activities which make up the industrial economy, primarily comprising Industrial and Service activities. In particular, these non-industrial type land uses are likely to create reverse sensitivity effects on Industrial and Service activities operating within the Industrial Zones. Methods to manage the effects of reverse sensitivity and the cumulative effects that the establishment of these activities can have on the ability of the Industrial Zones to achieve their functional purpose are currently very limited.
- 7.45. The ME Assessment Report points to the risks of not applying more restrictive provisions on the establishment of non-industrial type land uses within industrially zoned land. It notes that District Plan provisions which provide for the establishment of non-industrial type activities place competitive market disadvantages on industrial type activities within the very areas zoned for their establishment, operation and growth. Non-industrial type activities (such as Office, Retail and Commercial activities) can use sites more intensively and are capable of sustaining multiple businesses and offering greater returns to landowners than a single Industrial or Service type activity which will often require larger areas of land that might need to be occupied by raw materials, or need to provide a depot for machinery and equipment, or to internalise large volumes of truck/vehicle movements and parking.<sup>52</sup> The report finds that *'more stringent planning frameworks are needed that avoid too much flexibility in industrial zones so that industrial*

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<sup>52</sup> Page 96, Section 6.4.5 of the ME report

*activities that have a functional need to locate in those zones are protected.*<sup>53</sup> Further, the Assessment Report considers that purely Office based activities should be discouraged from industrially zoned land.

- 7.46. The growth of non-industrial activities within the Zone also has the propensity to increase the value of industrially zoned land by limiting the amount of sites available for Industrial and Service activities and setting precedent effects for developers that higher return land uses can be established. The Assessment Report shows that land values within the Industrial Zones have increased substantially in recent times.<sup>54</sup>
- 7.47. It is also considered reasonably likely that a higher proportion of predominant Office, Retail, Commercial and other similar non-industrial type activities operating within industrially zoned land will increase traffic and pedestrian movements where they had not been anticipated by the ODP by sheer fact of their higher occupancy numbers. These higher traffic and pedestrian movements are likely to be associated with additional staff and customers who visit these types of activities. This has potential to create conflicts between customers and staff of Office, Retail and Commercial activities both within the road corridor and within sites that also contain Industrial type activities involving high numbers of vehicle movements and large vehicle movements. Observations made during the ground truthing site visits suggest this is the case. In particular, there is a limited and disjointed active transport network, particularly for pedestrians, within the Industrial Zones.
- 7.48. However, the high proportion of ancillary Office, Retail and Commercial activities occurring within the Industrial Zones suggests that this type of multi-activity operating structure is important to the function of Industrial and Service activities within the District. This is emphasised by the ME Assessment Report<sup>55</sup> which suggests that providing for ancillary Office and Retail is essential to support the viability of industrial businesses. Ms Hampson also outlines that it is more efficient to have ancillary Retail and Office activities required by predominant Industrial and Service activities located in the same zone as one another rather than forcing the two components into separate areas where they would otherwise be permitted.

### **Issue 3 – Industrial Development Capacity**

- 7.49. The District is identified as a '*high growth urban area*'<sup>56</sup> under the National Policy Statement on Urban Development Capacity (NPS-UDC) 2016 and is therefore subject to the full suite of objectives, policies and requirements of the NPS-UDC. Local authorities identified as containing

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<sup>53</sup> Page 104, Section 7.3 of the ME report

<sup>54</sup> Page 98, Section 6.4.6 of the ME report

<sup>55</sup> Page 104, Section 7.3 of the ME report

<sup>56</sup> Interpretation section, National Policy Statement on Urban Development Capacity, 2016

high growth urban areas are required to comprehensively assess demand and capacity for both housing and business activities at least every three years commencing 31 December 2017.

- 7.50. The Council produced its first set of housing and business development capacity assessments in March 2018. For the purpose of this review, the Business Development Capacity Assessment 2017<sup>57</sup> (**BDCA**) is relevant and has been appended to this report as Appendix 2. Ms Hampson and Market Economics also authored this BDCA. It uses the two 'wards' approach in the same way that was applied in the ME Assessment Report on the industrial economy. The Wanaka Ward encompasses the area within the Wanaka urban growth boundary (**UGB**), as well as the Hawea and Luggate townships, and the Rural Industrial sub-zone in Luggate. The Wakatipu Ward includes land located within the Queenstown and Arrowtown UGBs as well as the small area of Lower Density Suburban Residential Zone (**LDSRZ**) adjacent to Lake Hayes and the Coneburn Industrial Zone. All other land is considered to form part of the rural environment and was not subject to assessment under the BDCA.
- 7.51. The BDCA contextualises business development within the Wanaka and Wakatipu Wards by measuring employment projections across 48 economic sectors. The BDCA cites this employment growth as the driver of demand for business land and floor space. The assessment outlines that industrial sectors have the fastest rate of growth across all sectors (72% compared to an average of 55% for all sectors), with employment across the industrial sector expected to increase by 4,220 workers by 2046.<sup>58</sup>
- 7.52. Since the BDCA was finalised in March 2018 a number of appeal proceedings, including mediations, have commenced on Stage 1 topics of the PDP review. As part of the Council's evidence filed for Topic 2 (Rural Landscape) proceedings, Ms Hampson has commented on the impact of the PDP Decisions Version and other recent changes on the outcomes of the BDCA.<sup>59</sup> While Ms Hampson's evidence doesn't necessarily update the existing BDCA, it does offer a more recent snapshot of business capacity within the District. In regard to this matter, it is noted that much of the Decisions Version of the PDP has been appealed and the outcome of these appeals cannot be foreseen. As has been discussed in this report, there are a number of other factors at play which influence the extent and reliability of land zoned for business related uses under the decisions version of the PDP.

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<sup>57</sup> Business Development Capacity Assessment 2017, Queenstown Lakes District, 15 March 2018 – draft final  
<https://www.qldc.govt.nz/assets/Uploads/Council-Documents/Committees/Planning-and-Strategy-Committee/10-May-2018/Item-1-Attachment-A-Business-Capacity-Assessment-2017-Final-1.5.2018.pdf>

<sup>58</sup> page 4 of the BDCA

<sup>59</sup> Evidence in Chief of Natalie Dianne Hampson for Queenstown Lakes District Council, Topic 2 – Rural Landscape, 12 October 2018

7.53. Table 6 below summarises the key changes and impacts of the PDP Stage 1 decisions version to business enabled zones where they are relevant to industrial development capacity.<sup>60</sup>

<b>Table 6: Vacant industrial capacity implications of the PDP Stage 1 decisions version</b>		
<b>Ward</b>	<b>Zone</b>	<b>Effect comment</b>
Wanaka	NA	Nil <sup>61</sup>
Wakatipu Ward	Frankton Business Mixed Use Zone (9.1 ha gross area)	Nil <i>'commercial and retail activities are likely to preclude industrial development due to higher returns'</i> <sup>62</sup>
Wakatipu Ward	Coneburn Industrial Zone (71 ha gross area)	+ 69% Industrial vacant land capacity + 44% Industrial vacant GFA <sup>63</sup>

7.54. Ms Hampson's evidence outlines that the Stage 1 decisions version of the PDP does not alter the industrial development sufficiency conclusions as they relate to the Wanaka Ward, which is considered to have significant surplus capacity enabled over the long term.<sup>64</sup>

7.55. Within the Wakatipu Ward, Ms Hampson's evidence suggests that the additional capacity enabled by way of the PDP decisions version represents 'a significant improvement on the situation'<sup>65</sup> illustrating a small surplus of capacity to cater for long term demand.

7.56. Acknowledging these revisions to the capacity assessments, Ms Hampson's evidence suggests that a number of additional matters should be considered to assist in contextualising realistic development capacity. The first matter relates to land ownership, in particular, vacant business land within the Frankton Flats B Zone that is owned by the Queenstown Airport Cooperation Limited (**QAC**). QAC's land holdings were not taken into account within the initial BDCA. This is consequential as the initial BDCA identified the only vacant industrial land in the Wakatipu Basin

<sup>60</sup> Ms Hampson's EIC (note: calculations are based on the 'alternative scenario' which aims to remove potential overlap of development capacity)

<sup>61</sup> Paragraph 6.2(a) and 6.4 of Ms Hampson's EIC

<sup>62</sup> Paragraph 6.2(c), Ms Hampson's EIC

<sup>63</sup> Paragraph 6.2(d), Ms Hampson's EIC, 'alternative scenario'

<sup>64</sup> Paragraph 6.3, Ms Hampson's EIC

<sup>65</sup> Paragraph 6.7, Ms Hampson's EIC, 'alternative scenario'



as being located within the Frankton Flats B Zone (precincts D and E1) and amounting to 17.5 ha.<sup>66</sup> QAC own 13.1 ha of this vacant capacity, comprising 67% or 9.1 ha within Precinct E1 and 37% or 4 ha within Precinct D.<sup>67</sup> Ms Hampson's evidence refers to this QAC owned land representing a '*significant share*'<sup>67</sup> of vacant industrial capacity. Figure 19 below illustrates this situation.



**Figure 19** - Vacant land (January 2018) Frankton Flats B Zone and Queenstown Airport Corporation Ownership (Ms Hampson's EIC Topic 2 – Rural Landscape).

7.57. QAC's master planning exercise designed to inform the nature, scale and location of future airport growth has presented three growth options<sup>68</sup>, each of which would utilise some of their landholdings within the Frankton Flats B Zone.<sup>69</sup> The initial BDCA did not anticipate the loss of

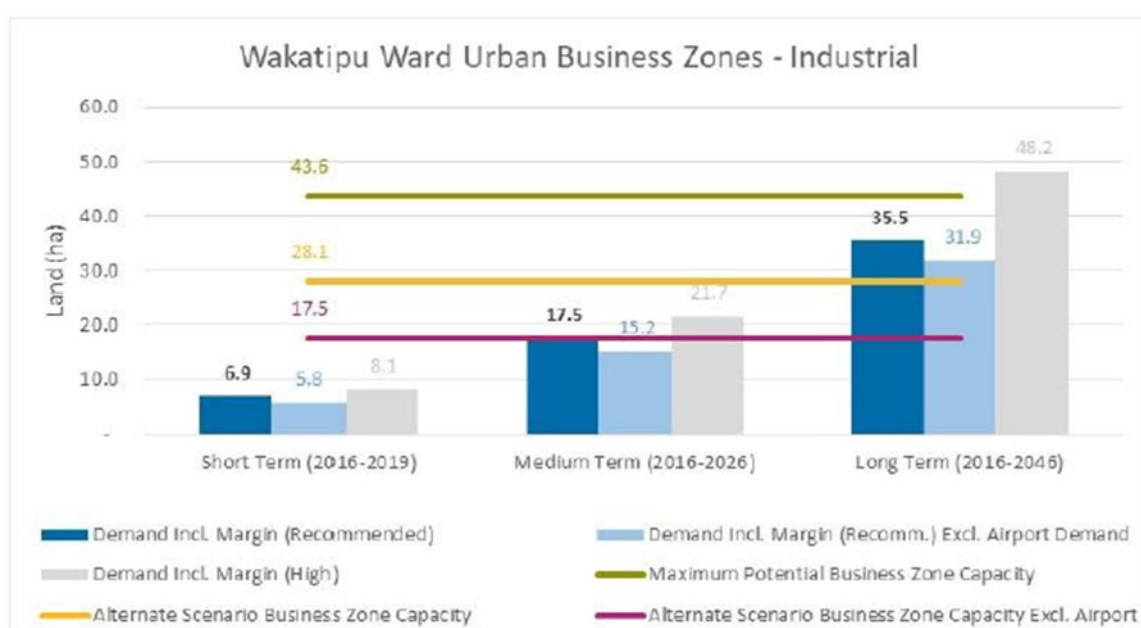
<sup>66</sup> Paragraphs 6.13 – 6.15 of Ms Hampson's EIC, 'alternative scenario'

<sup>67</sup> Paragraph 6.16, Ms Hampson's EIC

<sup>68</sup> Queenstown Airport Corporation, Master Plan Options, Lets Start Talking About Tomorrow  
<https://www.queenstownairport.com/assets/masterplan/Queenstown-Airport-Master-Plan-Options.pdf>

<sup>69</sup> Paragraph 7.56, Statement of Evidence of Derek Richard Foy, 31 August 2018, ENV-2018-CHC-15

potential industrial capacity in this way. Following the initial stage of consultation on its master plan options, QAC is considering other key long term planning initiatives for expansion within the District before progressing its preferred growth option.<sup>70</sup> Notwithstanding this position, QAC have not ruled out future growth of airport facilities within the Frankton Flats B Zone. It is therefore prudent to ensure the effect of QAC land ownership is considered in the context of industrial development capacity. Ms Hampson's evidence says that '*excluding this QAC vacant land has a material impact on industrial growth capacity in the Wakatipu Ward*'<sup>71</sup> and that QAC growth within the Frankton Flats B Zone could decrease vacant industrial capacity from 17.5 ha to 9 ha.<sup>72</sup> This scenario could result in a shortfall of vacant industrial capacity before reaching the mid-term (being the year 2026). Figure 20 below illustrates the outputs of the BDCA vacant industrial capacity model including under a QAC growth scenario.



**Figure 20** - Wakatipu Ward industrial vacant capacity model with QAC Frankton Flats B Zone land removed (Ms Hampson's EIC Topic 2 – Rural Landscape).

7.58. The additional capacity afforded by the Frankton Business Mixed Use Zone and Coneburn Industrial Zone detailed in Table 6 above, more than accounts for the losses associated with QAC ownership, affording a net increase of 28.5 ha.<sup>73</sup> Figure 21 below illustrates the effect of this additional capacity, being a sufficient supply of vacant industrial capacity in the Wakatipu Ward up to the medium term (being the year 2026). However, it is shown that additional supply

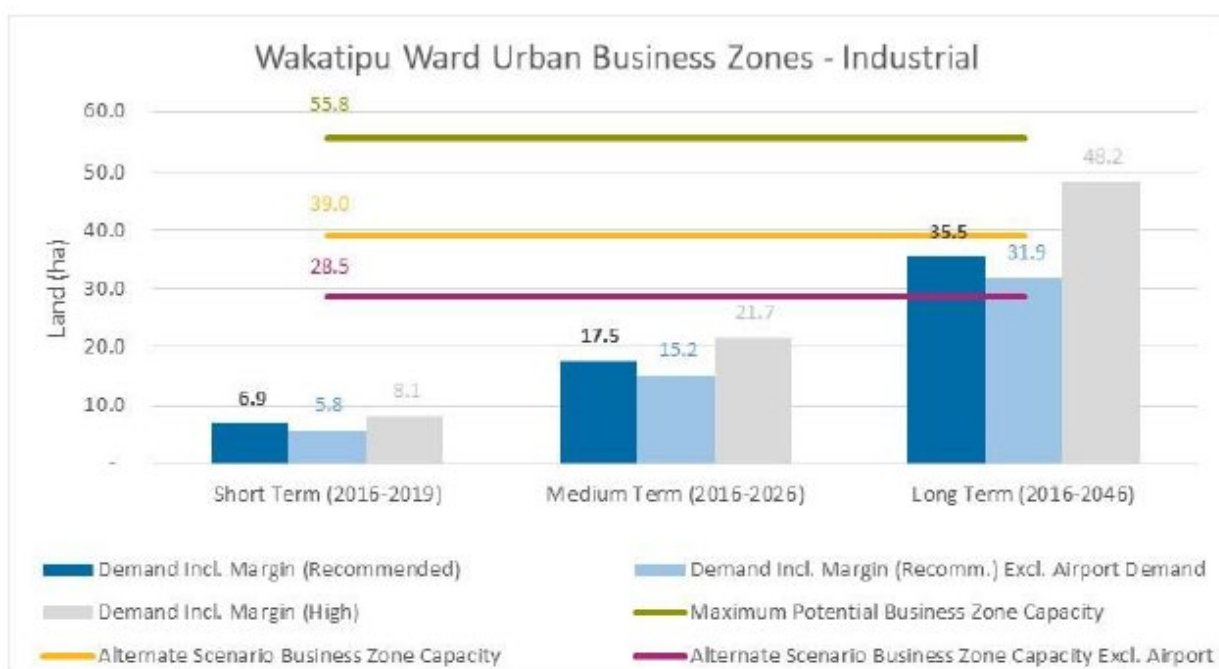
<sup>70</sup> Queenstown Airport Corporation, proposed noise boundary changes realigned with other planning work  
02 Oct 2018  
<https://www.queenstownairport.com/corporate/news-and-events/news/proposed-noise-boundary-changes-realigned-with-other-planning-work>

<sup>71</sup> Paragraph 6.19, Ms Hampson's EIC

<sup>72</sup> Paragraph 6.20, Ms Hampson's EIC 'alternative scenario'

<sup>73</sup> Paragraph 6.22, Ms Hampson's EIC

is necessary under the recommended alternative scenario prior to 2046. Ms Hampson suggests this represents a *'greater urgency to zone and service land dedicated for industrial land use now in the Wakatipu Ward'*.<sup>74</sup>



**Figure 21** - Wakatipu Ward industrial vacant capacity model with QAC Frankton Flats B Zone land removed and PDP decisions version additional capacity included (Ms Hampson's EIC Topic 2 – Rural Landscape).

- 7.59. In regard to the Coneburn Industrial Zone, it should be acknowledged that the timing of this land being development ready, and therefore representing viable industrial development capacity, is uncertain. While the Stage 1 appeals made on this zone have been resolved and this Zone is therefore considered operative, land within the Zone is currently being used for the purpose of quarrying, and it is understood that a significant amount of material is yet to be extracted, for the purpose of both generating economic gain for the current landowner, but also for the purpose of meeting the requirements relating to landscape protection and height limit contours as required by the Coneburn Structure Plan and the provisions of Chapter 44 (Coneburn Industrial Zone) which are necessary to avoid adverse visual effects on landscape amenity.
- 7.60. The initial BDCA was based on a set of population projections produced in May 2017 by Rationale Limited. Evidence produced by Mr Walter Clarke (formerly of Rationale) as part of the hearings on Stage 1 of the PDP review (Hearing Stream 13 – Queenstown mapping annotations and rezoning requests<sup>75</sup>) provides a summary of these growth projections. The Council has since received updated national data from Statistics NZ, and on migration and tourism numbers,

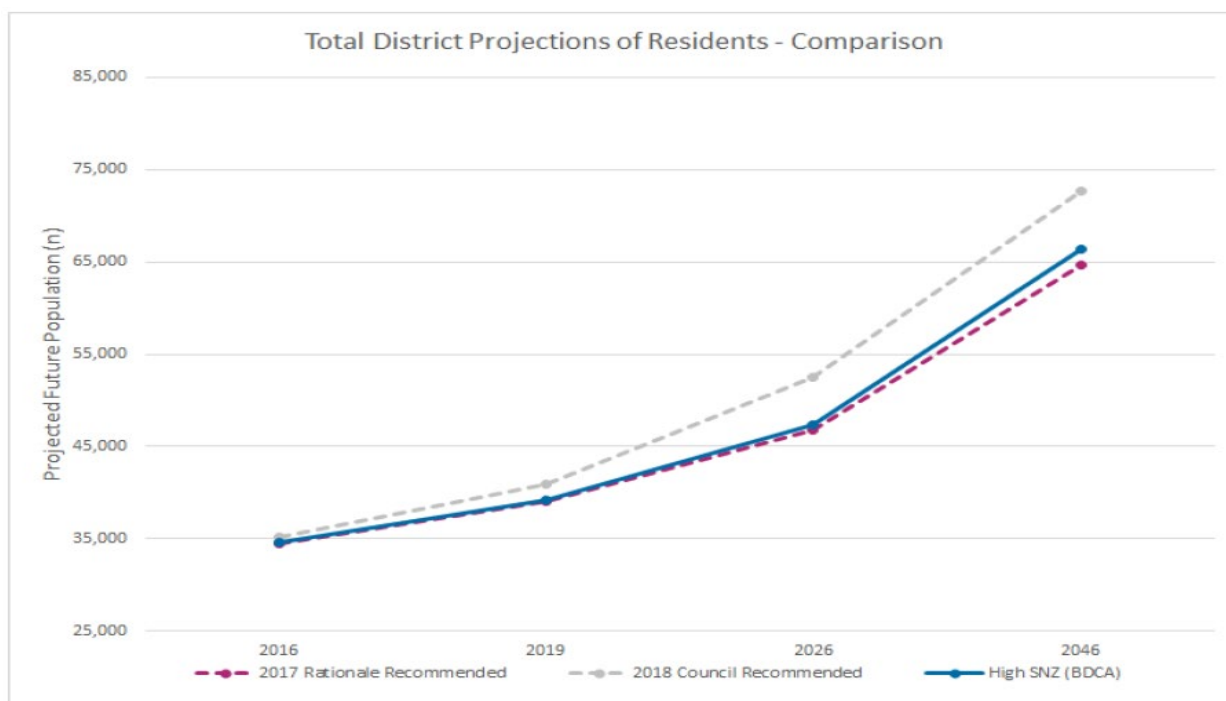
<sup>74</sup> Paragraph 6.25, Ms Hampson's EIC

<sup>75</sup> Statement Of Evidence Of Walter Antony Clarke On Behalf Of Queenstown Lakes District Council, Growth Projections, 19 June 2019

building and resource consent data, analysis on existing zoned capacity and a review of development trends. This updated data has resulted in revised population projections that were completed in December 2018.<sup>76</sup> These revised projections demonstrate that the District's population is growing at a faster rate than that considered in the May 2017 projections. More specifically, these updated projections show that the population is growing at a rate faster than the previous 'high growth' scenario. The demand for industrial development capacity within the Wakatipu and Wanaka Ward is therefore higher than both what was previously modelled under the BDCA and under the revised scenarios considered by Ms Hampson in her rural landscapes Topic 2 evidence.

7.61. Figure 22<sup>77</sup> below compares the recommended population projections produced by Rationale in 2017 used for the BDCA assessments with that of the high growth BDCA scenario and the most recent 2018 growth projections.

7.62. While the BDCA has not been updated as yet in respect to the December 2018 growth projections, it can no longer be assumed that surplus capacity exists in the Wanaka Ward over the long term (to year 2026) nor within the Wakatipu Ward over the short to medium term (years 2019 – 2026). In addition to the update required under the December 2018 growth projections, previously vacant capacity within the ODP Industrial Zones is likely to have diminished, either being taken up by industrial related activities, or possibly non-industrial related activities.



**Figure 22 – Comparison of population growth projections (ME Assessment report)**

<sup>76</sup> Queenstown Lakes District Population Projections (December 2018)  
<https://www.qldc.govt.nz/assets/Uploads/Our-Community/Population-Projections/QLDC-Growth-Projections-2018-to-2048-summary-table.pdf>

<sup>77</sup> Page 80, Section 6.1 of the ME report

- 7.63. The ME Assessment Report also highlights the effects that neighbouring land uses can have on realistic development capacity and the ability for businesses to service demand within land zoned for industrial purposes. Ms Hampson considers such effects may arise in Wanaka where land use and zoning surrounding the existing Industrial and Industrial B Zones has changed considerably. In particular, large areas of land adjoining the Industrial and Industrial B Zones has been zoned for residential purposes and the effectiveness of the provisions in protecting industrial type activities within the Zones from reverse sensitivity effects has yet to be tested.<sup>78</sup> Similar effects may be experienced in Frankton. Further, Ms Hampson outlines that these surrounding zonings can have a significant impact on industrially zoned areas, particularly where roads have been established to residentially or commercial zoned land that connect through an industrial zone resulting in delays in receiving and delivering goods and providing services.
- 7.64. Overall, the issue faced by the District in regard to industrial development capacity recommends a prudent approach in terms of the development and application of land use planning provisions relating to the management of industrially zoned land given the likely difficulties of zoning what is often very high priced rural land for industrial purposes. There is an evident need to develop a less flexible planning framework which focuses on prioritising the needs of those activities which comprise the local industrial economy, being Industrial and Service activities.
- 7.65. This review presents an opportunity to identify additional areas of land to be included within the GIZ in order to assist in meeting industrial development capacity constraints although there are a number of inherent challenges with assessing rezoning requests that are first contemplated in assessing a submission and potential for unfairness as people interested in such proposals will only be able to further submit in opposition or in support.
- 7.66. Currently, the Council is preparing a Future Development Strategy (**FDS**) document as required under the NPS-UDC as part of preparing a Strategic Spatial Plan for the wider Queenstown Lakes Area which encompasses Cromwell and the Wakatipu and Wanaka wards. This FDS will be directly informed by the BDCA and identify future urban environments, intensification opportunities, and associated development infrastructure required to provide sufficient development capacity.<sup>79</sup> This process is considered the best and most appropriate tool to inform the location, form and function of future industrially zoned land. However, it is noted that parties interested in industrial land have not had a clear opportunity to pursue this through the plan review process to date given the lack of a notified industrial chapter and the Council intends to assess submissions seeking industrial land on their merits.

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<sup>78</sup> Page 94, Section 6.4.4 of the ME report

<sup>79</sup> Page 8, Section 2.2, National Policy Statement on Urban Development Capacity, Responsive planning - Guide on producing a Future Development Strategy, Ministry for the Environment

7.67. The Council has received a proposal relating to a large area of land adjoining the Victoria Flats Landfill legally described as Lot 2 DP 420346 and Lot 8 DP 402448 (as contained within Computer Freehold Register 477524). This land is currently zoned Gibbston Character and Rural under the PDP, and is in-part subject to Designation 76 relating to the 'buffer area' associated with the Victoria Flat landfill. Some parts of the land are located within an Outstanding Natural Landscape. The proposal considers the land could absorb a range of land uses including residential and accommodation activities, but that the most appropriate use of the land is for predominantly industrial type activities. The information received for this proposal is not comprehensive and has not addressed the range of rezoning principles set out by the IHP.<sup>80</sup>

#### **Issue 4 – Structure and complexity of the ODP Industrial Zones framework**

7.68. The Business Zone, Industrial Zone and the Industrial B Zone are set out in Section 11 of the ODP (Business and Industrial Areas). Section 11 sets out objectives, policies and methods relating to the Industrial Zone and the Industrial B Zone as well as the Business Zone. The Business Zone is no longer included within the PDP structure and the majority of land previously included within this Zone has since been rezoned through the Stage 1 review process to Business Mixed Use Zone. One area of Business Zone remains, being land in the area of Industrial Place in Queenstown. This area is still under review in respect to natural hazards and is not notified as part of these proposals.

7.69. Section 11 of the ODP sets out a shared suite of objectives and policies applicable to both the Industrial Zone and the Business Zone. A separate suite of objectives and policies is included within Section 11 which relates to the Industrial B Zone only. Following these objective and policies, Section 11 contains rules for each of the Business Zone, the Industrial Zone and the Industrial B Zone. In addition, Section 11 contains sections on '*Resources, Activities and Values*', '*Issues*', a description of '*Implementation Methods*' as well as paragraphs relating to '*Explanation and Principle Reasons for Adoption*' and '*Environmental Results Anticipated*'. A set of '*Assessment Matters*' are also included which relate to both the Business and Industrial Zones, while the Industrial B Zone gets its own set of '*Assessment Matters*', as well as a specific flow chart illustrating an '*Anticipated resource consent process for developing the zone*'.<sup>81</sup> Adding to this complexity, Section 11 introduces a second term for the Industrial Zone, being the '*Industrial (A) Zone*' at various points throughout the section. This structure is lengthy, complex and can be difficult to follow. The various separate components do not provide any particular assistance to plan users nor do they facilitate consistent or effective plan administration.

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<sup>80</sup> Para 2.14, Strategic Overview And Common Themes, Section 42A Report, Craig Barr, 17 March 2017

<sup>81</sup> 11.5.4 of Section 11

7.70. Section 11 does not clearly distinguish between the Industrial and Business Zones. It is not best practice to have a single set of objectives and policies, as well as assessment matters which relate to two separate zones (being the Industrial Zone and the Business Zone) which intend to achieve different land use outcomes. Objective 1 in particular relates to both '*Business and Industrial Activity*' and reads more as a purpose statement:

*'A range of industrial locations which accommodate a variety of appropriate activities, including the maintenance and consolidation of existing business areas.'*

Policy 1.1 does not offer any particular direction or explanation for Objective 1 and simply states:

*'To enable a wide range of activities to establish throughout the business and industrial areas.'*

- a. This lack of clear policy direction is reflected in the methods which do not effectively manage the establishment of non-industrial type activities. This is likely to have contributed to the large number of non-industrial type of activities which have established and grown in scale within the Industrial Zones, as described in the preceding sections of this report.
- b. The Industrial B Zone was introduced to the ODP at a later date (June 2013) through Plan Change 36.<sup>82</sup> It offers a clearer direction in its purpose statement, providing for Industrial and Service activities, with Office, Residential, Visitor Accommodation and almost all Retail activities being avoided. Policy 1.3 sets out the position of the Industrial B Zone in regard to retail activities. It outlines that almost all retail activities are to be avoided to preserve the Zone for those uses which are specifically enabled. The layout and structure of the Zone is entirely different to that which is used for the Industrial and Business Zones, and it uses diagrams and structure plans within the framework.

7.71. The Ballantyne Road Mixed Use Zone was introduced to the ODP in April 2009 through Plan Change 32.<sup>83</sup> The purpose statement is clear that the Zone is designed primarily to accommodate yard based service and yard based industrial activities as well as appropriate mixed business uses at the periphery of the Zone. The chapter framework and structure of the Ballantyne Road Mixed Use Zone appears to be a mix of the Industrial/Business Zones and Industrial B Zone, incorporating both a site/zone standard paragraph layout (i.e. similar to the Industrial/Business Zones) and a table format (i.e. similar to the Industrial B Zone). Assessment matters are also included.

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<sup>82</sup> Plan Change 36 documents

<https://www.qldc.govt.nz/planning/district-plan/district-plan-changes/plan-change-36-wanaka-industrial-zoning-extension/>

<sup>83</sup> Plan Change 32 documents

<https://www.qldc.govt.nz/planning/district-plan/district-plan-changes/plan-change-32-ballantyne-road-mixed-use-zone-wanaka/>

- 7.72. The ODP includes a number of definitions that may be unnecessary. The definitions of Light Industrial activity, Yard Based Industrial activity, and Yard Based Service activity are largely subsets of the definition of Industrial activity or Service activity. The Industrial Zones framework does not apply different activity status to these activities or set out different standards or other controls for these activities.
- 7.73. Overall, the length and complexity of these ODP sections does not seem to be warranted. A single zone framework that consolidates the existing set of provisions is considered appropriate. This single Zone framework would assist the Council in implementing the National Planning Standards which outline that Council's should apply one or more of three types of industrial zone within their District's, being the Light, General or Heavy Industrial Zone.<sup>84</sup> Given the nature of the District's industrial economy being comprised not especially of heavy or light industrial activities, but more of a mix of Industrial and Service activities that are supported by a range of ancillary activities, a General Industrial Zone is considered generally appropriate. Avoiding the complexity of providing separately for Light Industrial activity, Yard Based Industrial activity, and Yard Based Service activity would also assist in giving effect to the National Planning Standards. While there may be other opportunities to give effect to the National Planning Standards through this plan review process, it is considered more effective and efficient to undertake these changes in a more strategic and systematic manner at a later date. Further, there is no requirement to do so at this stage.

#### **Issue 6 – Minimum lot size within the Industrial Zones**

- 7.74. Lot sizes play an important role in determining whether or not sites are capable of meeting the functional needs of activities and development that are anticipated within a zone. They establish fundamental site limitations, which in many cases cannot be amended retrospectively. Very rarely do opportunities arise to amalgamate sites which are too small in order to accommodate activities that might require a larger site. They also have a profound effect on land value, vehicle movements and variously preclude or provide flexibility for activities with variable land requirements.
- 7.75. Table 7 below provides a summary of the minimum lot sizes set out within Section 15 (Subdivision, Development and Financial Contributions) of the ODP for the three Industrial Zones subject to this review.

<b>Table 7 – ODP minimum lot sizes within the Industrial Zones</b>	
<b>Zone</b>	<b>ODP Minimum lot size<sup>85</sup></b>
Industrial	200 m <sup>2</sup>

<sup>84</sup> Table 4, District Plan Structure, Part 3 – Zones

<sup>85</sup> 15.2.6.3 of Section 15 (Subdivision, Development and Financial Contributions)



Industrial B	1000 m <sup>2</sup>  Except that the minimum lot size shall be 200m <sup>2</sup> where the subdivision is part of a complying combined land use/ subdivision consent application or where each lot to be created, and the original lot, all contain at least one business unit.
Ballantyne Road Mixed Use Zone	Activity Area C – 3000m <sup>2</sup> Activity Area D – 1000m <sup>2</sup> All other Activity Areas - No minimum lot size.

7.76. The variability illustrated between minimum lot sizes outlined in Table 7 possibly reflects the fact that the three zones have been developed through separate plan changes processes. This variability adds an additional layer of complexity to the ODP Industrial Zones framework and creates a level of uncertainty for the Council in terms of the type of land use planning outcomes that industrially zoned land is likely to provide when considered as a whole.

7.77. It is considered that the 200 m<sup>2</sup> minimum lot size provided for within both the Industrial and Industrial B Zones is too small to enable land to meet the needs of those activities which principally make up the District's industrial economy, being Industrial and Service activities. In particular, bulky items and equipment and large buildings to store them in are often required as key inputs for the operation of these activities. Similarly, larger areas are required on sites in order to accommodate the movement of vehicles, whether they be a larger number of smaller vehicles or heavy vehicles associated with the loading and unloading of goods for the activity. The ME Assessment Report supports this, outlining that busier streets and greater competition for on-street space creates a greater need to internalise the needs of vehicles associated with industrial type activities and that a key method to achieve this is providing larger site sizes.<sup>86</sup>

7.78. The intent of the requirement that small lot subdivisions be associated with a 'business unit' in the Industrial B zone seems to be aimed at ensuring that small lot subdivisions do not result in complying business activities being entirely displaced from the zone.<sup>87</sup> However, it is not clear what is meant by a 'business unit' as this term is not defined within the definitions section of the ODP and no further context is provided within the Industrial B part of Section 11 (Business and Industrial Areas).

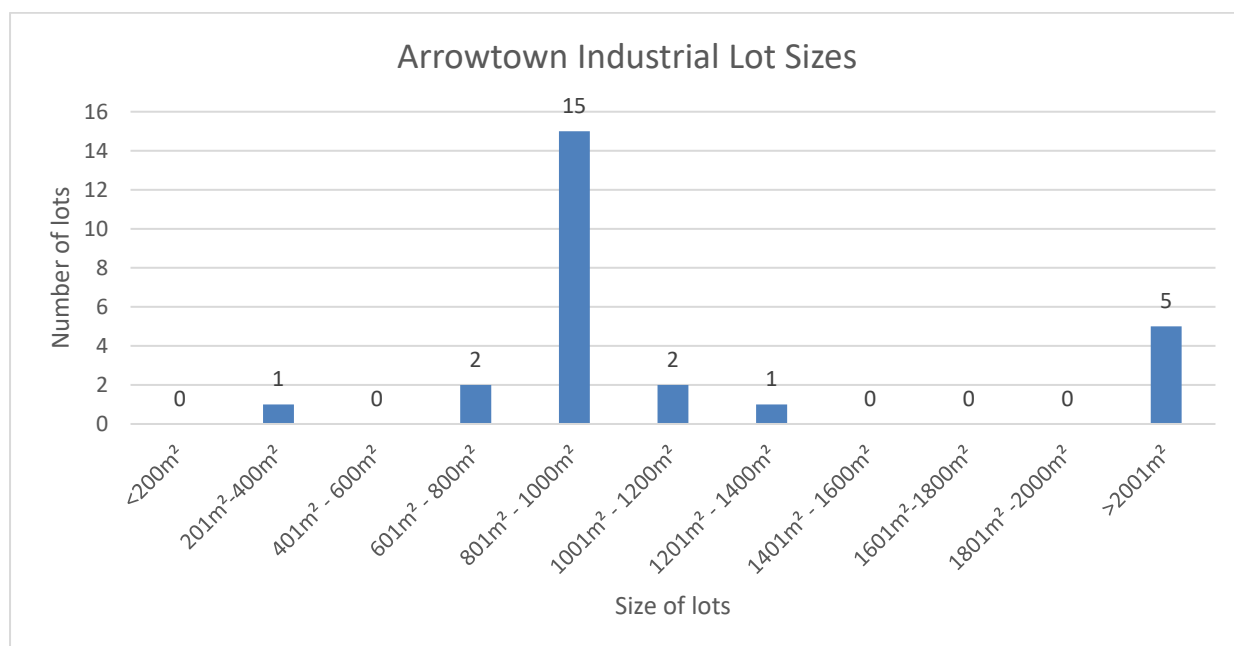
7.79. An analysis of lot sizes within the existing Industrial Zones was undertaken as part of this review. Figures 23 – 26 and Table 8 below illustrate the distribution of lot sizes within each of the ODP Industrial Zones. This analysis demonstrates that no sites have been created within these Zones

<sup>86</sup> Page 94, Section 6.4.4 of the ME report

<sup>87</sup> Policy 1.5, ODP Industrial B Zone, Section 11, Issues, Objectives and Policies

which are less than 200 m<sup>2</sup>, but that a reasonable proportion of all sites (33.9%) are smaller than 1,000 m<sup>2</sup>. The remaining sites (66.1%) were greater than 1,000 m<sup>2</sup>.

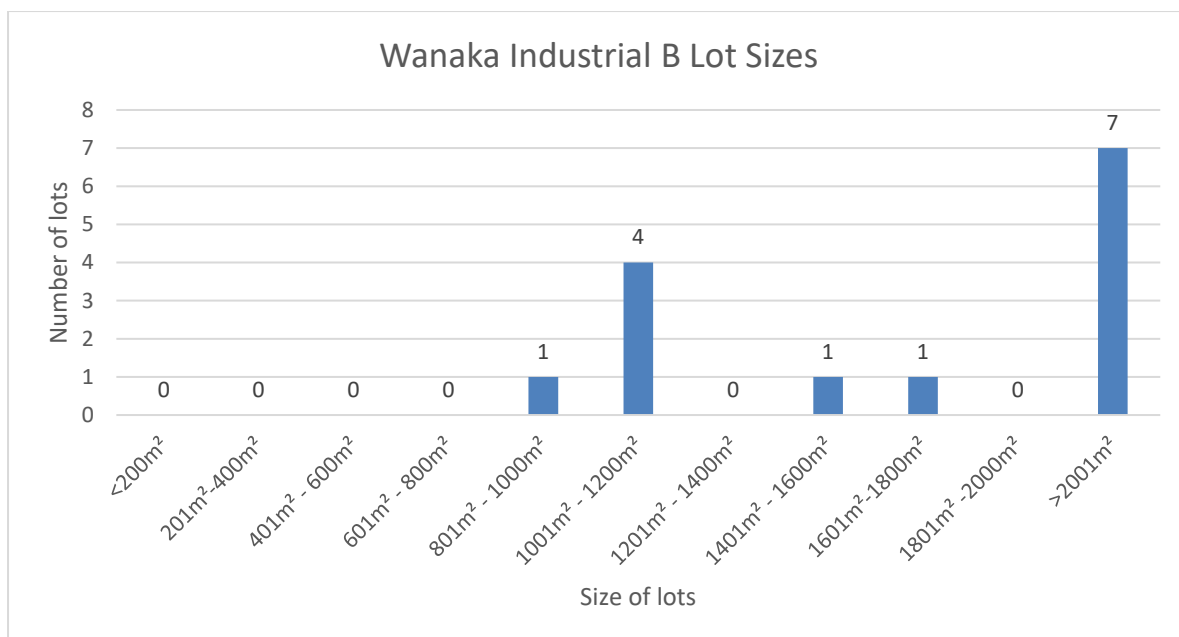
- 7.80. The Glenda Drive Industrial Zone contains a wide range of site sizes in comparison with other areas located within the Industrial Zones which tend to show a larger proportion of smaller site sizes. Overall, there is no clear evidence that the variable lot size controls have produced significantly different economic or environmental results.



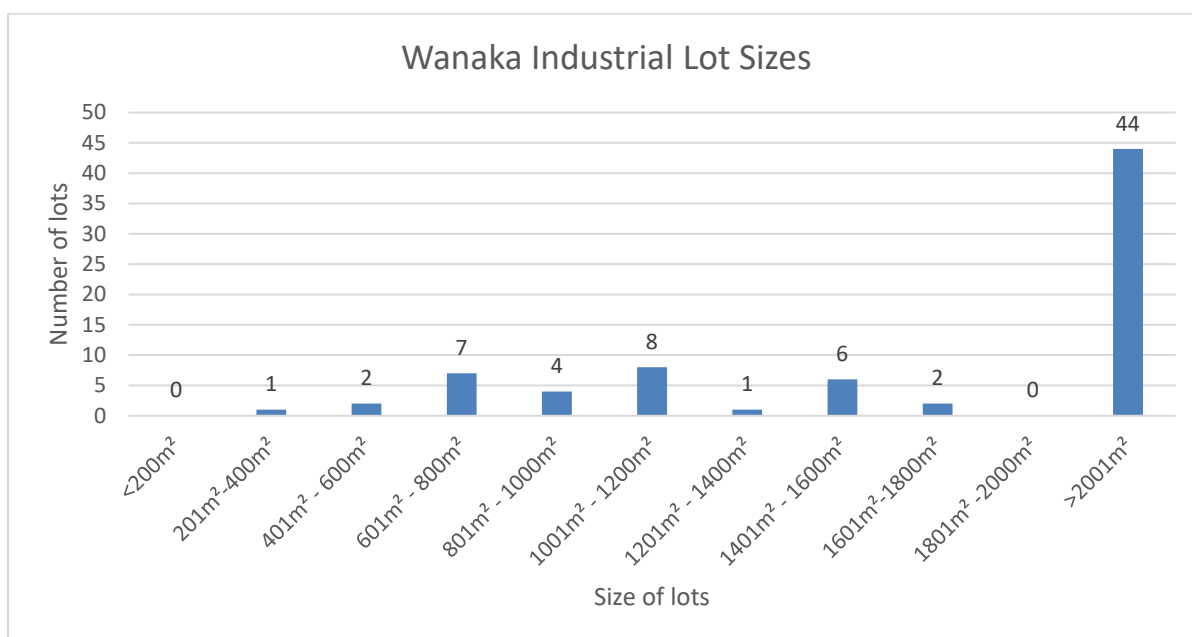
**Figure 23** – Lot size analysis within the Arrowtown Industrial Zone



**Figure 24** – Lot size analysis within the Glenda Drive Industrial Zone



**Figure 25** – Lot size analysis within the Wanaka Industrial B Zone



**Figure 26** – Lot size analysis within the Wanaka Industrial Zone

Lot Sizes	Arrowtown (Industrial)	Glenda Drive (Industrial)	Wanaka (Industrial)	Wanaka (Industrial B)	# Totals	% Totals
<200m²	0	0	0	0	0	0
201m²-400m²	1	18	1	0	20	5.3
401m² - 600m²	0	39	2	0	41	10.9
601m² - 800m²	2	12	7	0	21	5.6
801m² - 1000m²	15	25	4	1	45	12.0
1001m² - 1200m²	2	31	8	4	45	12.0
1201m² - 1400m²	1	49	1	0	51	13.6
1401m² - 1600m²	0	17	6	1	24	6.4

1601m <sup>2</sup> -1800m <sup>2</sup>	0	11	2	1	14	3.7
1801m <sup>2</sup> -2000m <sup>2</sup>	0	1	0	0	1	0.3
>2001m <sup>2</sup>	5	57	44	7	113	30.1
<b>Totals</b>	<b>26</b>	<b>260</b>	<b>75</b>	<b>14</b>	<b>375</b>	<b>100</b>

7.81. This analysis indicates that site sizes within the Industrial Zones are somewhat evenly distributed. Approximately 34% of sites are between 200 m<sup>2</sup> and 1000 m<sup>2</sup>, 32% of sites are between 1001 m<sup>2</sup> and 1600 m<sup>2</sup>, and 34% of sites are between 1601 m<sup>2</sup> and >2000 m<sup>2</sup>. This suggests that a degree of flexibility in terms of site sizes is sought by the market within the Industrial Zones and that there is strong demand for large and medium sized sites. Lesser demand appears to be present for smaller sites with approximately 16% of sites being less than 600 m<sup>2</sup>. Overall, the spread of site sizes reflects the functional needs of Industrial and Service activities as described above. This is supported by the ME Assessment Report analysis which outlines that the majority of industrial economy businesses seeking industrial zone locations are small-medium sized and that individual zones should ideally provide for a small share of larger sites as part of the mix of subdivided lots.<sup>88</sup>

#### **Issue 6 – Parking, manoeuvring and loading**

7.82. Sufficient provision for parking, manoeuvring and loading within land zoned for industrial purposes is important, both to ensure sites are capable of serving the needs of the types of activities anticipated within the Zone, and to ensure that activities which create demand for parking, manoeuvring and loading do not adversely affect the safe and efficient operation of the roading network.

7.83. A survey of business operators located within the Industrial Zone conducted as part of the 2010/2011 monitoring report undertaken by Council demonstrated that 74% of respondents were concerned about an insufficient amount of parking and loading space within the Zone.<sup>89</sup> Specific responses collected from the survey point to small site size and poor site design as being factors preventing large vehicles associated with business and industrial activities being able to effectively provide parking or loading onsite. A selection of these comments is included below:

*“Planning of Industrial and Business zones has been short sighted by not ensuring roading is wider and more parking available.”*

*“Increase the number of carparks / lot; we do not need another Glenda Drive.”*

<sup>88</sup> Page 103, Section 7.3 of the ME report

<sup>89</sup> Page 7, Queenstown Lakes District Council, Industrial and Business Zone Review, July 2010

*"This development has been allowed to proceed with totally inadequate onsite parking for the business uses intended by the buildings permitted - eg freight businesses that can't be accessed by trucks, offices that readily have 6 people but only parking for 2-3 and visitors, should never be allowed by the planning rules – it seems too easy to build these commercial premises with totally inadequate parking allowed by QLDC."*

*"Not sure what can be done about existing parking issues, but suggest future businesses and council require more parking for staff and customers."*

*"Small lot size can't provide parking."*

*"My customers often have nowhere to park because staff from other local businesses use all the parks for all day parking. Very frustrating for me and my customers. I lose business because of it."*

*"Our own premises are fine as we have a yard but street parking is extremely bad. We constantly have to move vehicles parked over our access."*

7.84. During the site visits conducted as part of the current review, informal and uncontrolled vehicle parking was observed on the street and/or within the road corridor, including on grass verges and footpaths.

7.85. The ODP Transport Chapter (Section 14) was reviewed as part of Stage 2 of the PDP review and the decisions relating to the proposed Transport Chapter (Chapter 29) were released on 7 March 2019.<sup>90</sup>

7.86. Consideration of minimum parking requirements through the review of the ODP Transport provisions was supported by expert technical advice produced by MRCagney<sup>91</sup>. In assessing the ODP minimum parking requirements, MRCagney identified a number of minimum parking requirements that they considered inconsistent with common practice, including those for Industrial activities. In particular, MRCagney had the following advice in regard to minimum parking requirements for Industrial activities:

*"The existing parking requirement for staff of industrial activities at 1 per 25 m<sup>2</sup> of floor area plus 1 per 100 m<sup>2</sup> of storage space also appears quite high based on our experience with the setting of requirements for similar activities in other council areas. At this rate, this is comparable to the*

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<sup>90</sup> Stream 15 Report, Report and Recommendations of Independent Commissioners Regarding Chapters 25, 29, 31, 38 and Visitor Accommodation, Report 19.4 - Chapter 29 Transport  
<https://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/Proposed-District-Plan/PDP-Stage-2-Decisions/Independent-Hearing-Panel-Recommendation-Reports/Report-19.4-Chapter-29-Transport-Final-11-1-19.pdf>

<sup>91</sup> MRCagney, Technical Note, Parking Advice, 18 October 2017

*existing minimum parking requirements for retail activities in the District, even though industrial activities are likely to require less on-site parking, and have less parking turnover than retail. As such, existing minimum parking requirements for industrial activities may also impose high land, development and opportunity costs for the developer, irrespective of their actual need for on-site parking. In this regard, basing parking requirements for industrial activities on actual staff numbers or lowering the rate of parking provision, may facilitate the establishment of industrial activities in the District.'*

7.87. Based on this expert advice, Council recommended that minimum onsite parking requirements be reduced for Industrial activities. Table 9 below compares the minimum parking requirements under the ODP and PDP Transport Chapters for Industrial and Service activities.

<b>Table 9 – Comparison of minimum parking requirements under the ODP and PDP Transport Chapters</b>	
<b>ODP Transport Chapter (Section 14)<sup>92</sup></b>	<b>PDP Transport Chapter (Chapter 29)</b>
<b>Industrial activity</b> Residents/Visitor - 0 Staff/Guests - 1 per 25m <sup>2</sup> area used for manufacturing, fabricating, processing, or packing goods plus 1 per 100m <sup>2</sup> storage space  <b>Service activity</b> Residents/Visitor - 1 per 100m <sup>2</sup> Staff/Guests - 1 per 100m <sup>2</sup>	<b>Industrial activity or Service activity<sup>93</sup></b> Resident/Visitor - 0 Staff/Guest - 1 per 50 m <sup>2</sup> of indoor and outdoor area/GFA Except: - 1 per 100m <sup>2</sup> of GFA used for warehousing and indoor or outdoor storage (including self-storage units); and - 1 per 100m <sup>2</sup> of GFA for distribution centres
<b>Motor vehicle repair and servicing</b> Residents/Visitor - 1 per 25m <sup>2</sup> of servicing area plus 2 per establishment for heavy commercial vehicle parking  Staff/guest - 1 per 25m <sup>2</sup> workshop area.	<b>Motor vehicle repair and servicing<sup>94</sup></b> Resident/Visitor - 1 per 25m <sup>2</sup> of servicing/ workshop area or 2.5 per work bay (up to a maximum of 50m <sup>2</sup> for each work bay), whichever is greater.

<sup>92</sup> Table 1 of Section 14 (Transport)

<sup>93</sup> 29.8.19 of Chapter 29 (Transport)

<sup>94</sup> 29.8.20 of Chapter 29

	<ul style="list-style-type: none"> <li>- In addition, 2 heavy vehicle parking spaces per establishment</li> </ul> <p>Staff/guest</p> <ul style="list-style-type: none"> <li>- 1 per 25m<sup>2</sup> servicing/ workshop area or 1 per work bay, whichever is greater</li> <li>- Note: parking spaces will also be required for any on-site office and retail space pursuant to those rules.</li> </ul>
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7.88. While the PDP Transport Chapter increased minimum parking requirements for Service activities, there appears to be an apparent contradiction between the 2010/2011 monitoring exercise survey responses and the more recent site visit observations with those Stage 2 recommendations to reduce the minimum parking requirements for Industrial activities. Reflecting on the MRCagney technical advice, it is considered that, for the most part, on-street parking issues within the Zones are unlikely to be associated with Industrial and Service activities themselves, but rather, the proliferation of non-industrial type activities (i.e. Office, Retail and Commercial activities) which have established within the Zone, as discussed in the preceding sections of this report. These non-industrial activities have greater parking requirements, particularly associated with the attraction of customers. This supports the application of a more restrictive planning framework in regard to the establishment of non-industrial type activities within the Industrial Zones

7.89. Overall, when viewed in the context of the wider set of changes proposed through this review, it is considered that the PDP Transport Chapter sets out an effective and efficient framework for managing parking and manoeuvring related issues within the Industrial Zones. Discrete variations are proposed to ensure the GIZ is properly incorporated into the PDP Transport Chapter. This includes the identification of sites within the GIZ as being required to provide off-street loading space. A variation is also proposed to Policy 29.2.4.9 to ensure Industrial activities and Service activities are specifically considered in terms of the location, design, and layout of access, manoeuvring, car parking spaces and loading spaces.

## **Issue 7 – Amenity within and outside of the Industrial Zones**

7.90. Industrial zoned land is intended to accommodate specific types of activities that are known to have potential to create noise, odour, heavy traffic movements and other effects, and to accommodate larger buildings. However, it is also important to recognise that industrially zoned land forms part of the urban environment in which businesses locate and which attract people for the purpose of employment and trade. Therefore, it is realistic to expect a Zone of this kind to

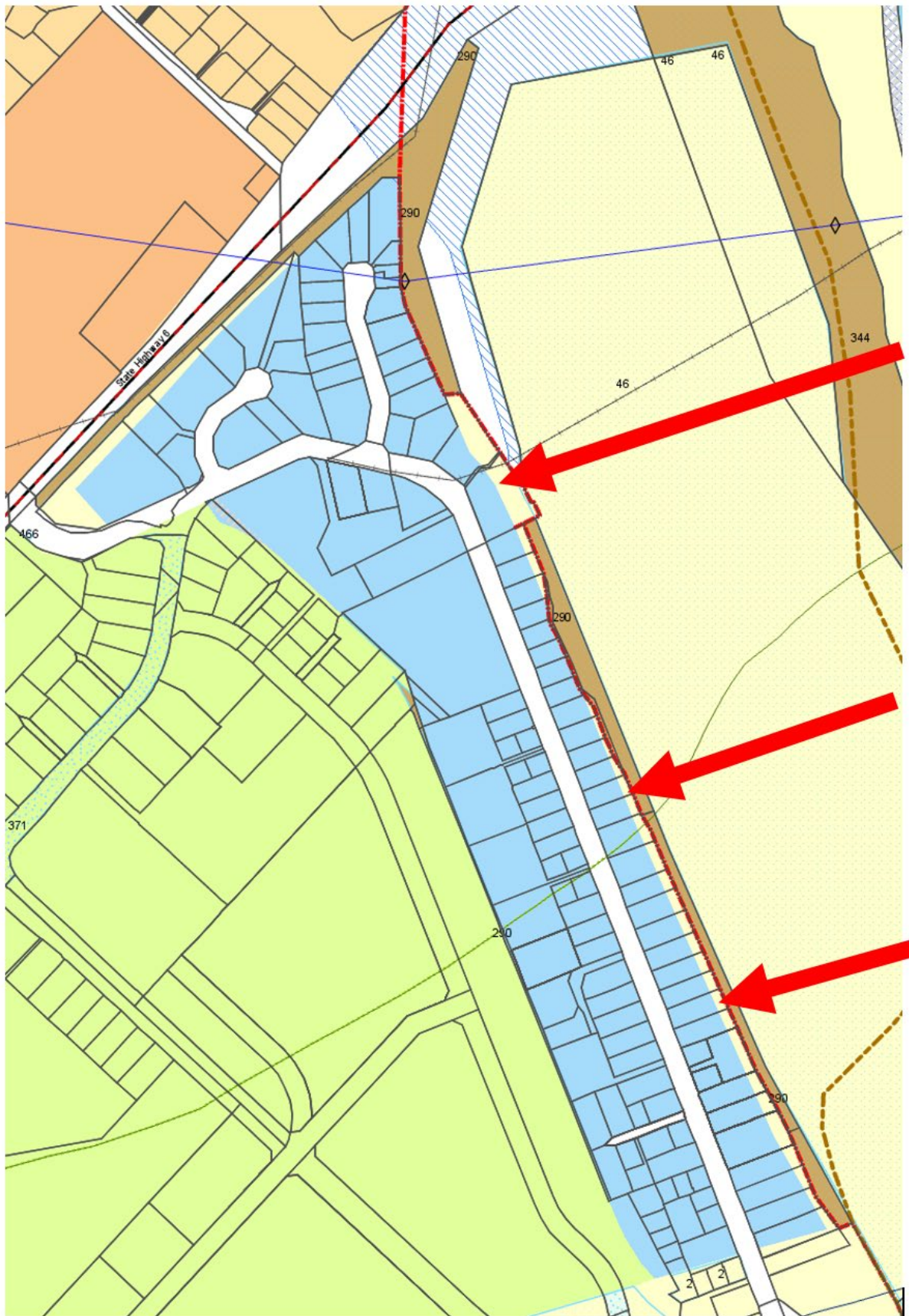
provide an environment which achieves a reasonable balance between quality and functional usability. This can be achieved by ensuring that built form within the Zone is of an appropriate scale, appearance and location, and that activities and development within the Zone do not appear unsightly and have positive relationships with other sites and public spaces. It is also important to ensure that people who work within and visit the Zone enjoy healthy and safe experiences.

- 7.91. There are numerous examples of unsightly outdoor storage located where they are highly visible from roads, adjoining sites and other public places. High quality amenity outcomes are not anticipated within the Zone, however, an appropriate balance needs to be struck if businesses within the Zones are to provide environmental and social outcomes that are conducive to attracting employees and trade.
- 7.92. A number of areas within industrially zoned land are located adjacent to or in close proximity to main gateway routes into Queenstown, Wanaka and Arrowtown. These main gateway routes are important when viewed in the context of the District's economy in which tourism and high quality landscape and urban environments play an integral role. These routes offer a large number of tourists with their first and/or last impression of the District's main urban environments. It is therefore important that activities and development within the Industrial Zones do not adversely affect these main gateway routes.
- 7.93. Industrially zoned land tends to be located in close proximity to land zoned for the purpose of accommodating more sensitive land uses. This includes the Lower Density Suburban Residential Zone, the Meadow Park Special Zone and the Rural Residential Zone. Each of these zones have a residential focus in which higher amenity values are anticipated. It is important to ensure that activities operating at the periphery of industrially zoned land, which often produce effects associated with noise, glare, dust, odour, shading and visual effects, do not adversely affect the level of amenity within other adjoining zones.

#### **Issue 8 – Split zonings, inappropriate zoning layout and rezonings**

- 7.94. There are a number of instances where sites are partially located within the existing Industrial Zone along Glenda Drive. This situation is illustrated in figure 27 below.





**Figure 27** – Split zoning to the rear of sites situated to the east of Glenda Drive (indicated by red arrows). Blue shading illustrates the extent of the ODP Industrial Zone and yellow shading shows the extent of Rural Zone (Multiple legal descriptions).

- a. It is understood that much of this split zoning was established to act as a landscape protection strip<sup>95</sup>. However, a number of resource consents have been granted for buildings to be established in this area. This rural strip zoning has therefore produced a number of non-complying activity resource consents which have increased the cost and complexity of development in this area without achieving the intended protection. This is therefore inappropriate zoning that should be rectified. This position was endorsed by the IHP during Stage 1 of the PDP review process.<sup>96</sup>
- b. Ms Helen Mellsop (Landscape Architect) has produced a memo for the Council in regard to this matter attached to this report as Appendix 3.<sup>97</sup> Ms Mellsop notes that about half of the sites traversed by the Rural Zone strip have buildings that extend into the Zone and there does not appear to be any vegetation within the strip that would screen development when viewed from the east. Further, Ms Mellsop notes that vegetation which does mitigate the visual impact of the buildings is located within the walking/cycling trail lot immediately to the east (zoned Informal Recreation in Stage 2 of the PDP) or else further down the escarpment within Council-owned Rural land. Given this, Ms Mellsop considers that rezoning this strip of Rural land would not result in any more than a low level of adverse effect on the landscape character or on visual amenity values, as long as the height of any new buildings did not exceed that of current development.
- c. The proposed provisions relating to building height will enable buildings of a greater height in this location. It is proposed to increase the maximum permitted building height from 6 m to 10 m. It is considered that increasing this height limit by 4 m would not result in any adverse visual effects when viewed from the surrounding area. In particular, there are a number of buildings already located within the Rural Zone strip and are visible from the surrounding area. Additionally, it is considered likely that 10 m high buildings set back from the escarpment edge (i.e. outside of the existing Rural Zone strip) would be visible from beyond the existing Industrial Zone. Further, it is considered that the potential economic benefit of enabling greater flexibility in terms of building height in this location outweighs any potential landscape effects. Therefore, it is considered appropriate that these sites be entirely located within the GIZ.

7.95. The land outlined in red in Figure 28 below were zoned Rural through Stage 1 of the PDP. This land is located at the southern end of Glenda Drive near its intersection with Hawthorne Drive.

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<sup>95</sup> Page 17, Section 5, Monitoring Report for the Business and Industrial Zones, Policy and Planning, Queenstown Lakes District Council. November 2011.

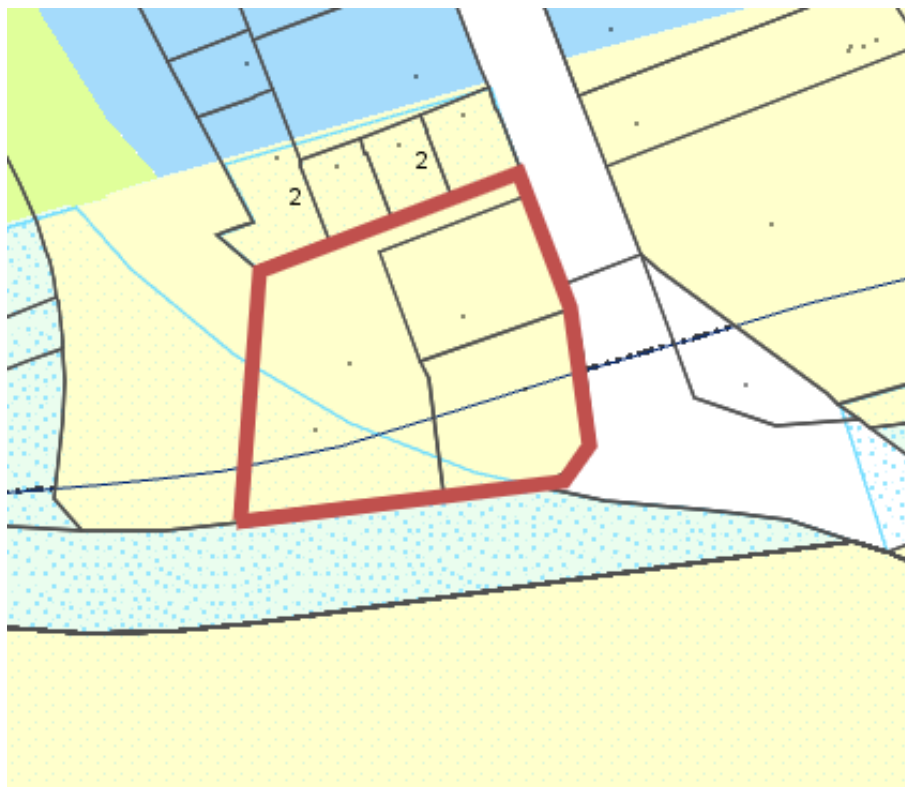
<sup>96</sup> Report 17-6, Report and Recommendations of Independent Commissioners Regarding Mapping of Frankton, Lake Johnson, Tucker Beach Road

<sup>97</sup> Memo, Glenda Drive Rural General Zoning, 21 February 2019

The Stage 1 IHP heard a submission<sup>98</sup> on this land requesting that it be included within the Industrial Zone. However, as the Industrial Zone did not form part of the PDP at this time the IHP were not able to apply this zoning and instead applied the Rural Zone as an interim measure. For clarity, the land is also not included in Designation #2 relating to the Queenstown Airport. The IHP in their decision state the following in regard to this land:

*'While an industrial zoning would probably be the most appropriate zoning for this land given its location between the airport and industrial land, we had no evidence on whether the Industrial A Zone sought was compatible with the structure of the PDP, nor evidence of the actual text and provisions to be included.'*<sup>99</sup>

In addition, it is noted that resource consents<sup>100</sup> have been granted for subdivision and land use on the land which enables future buildings and activities to occur in accordance with the provisions for the Industrial Zone. Therefore, it is appropriate that this land be included within the GIZ.



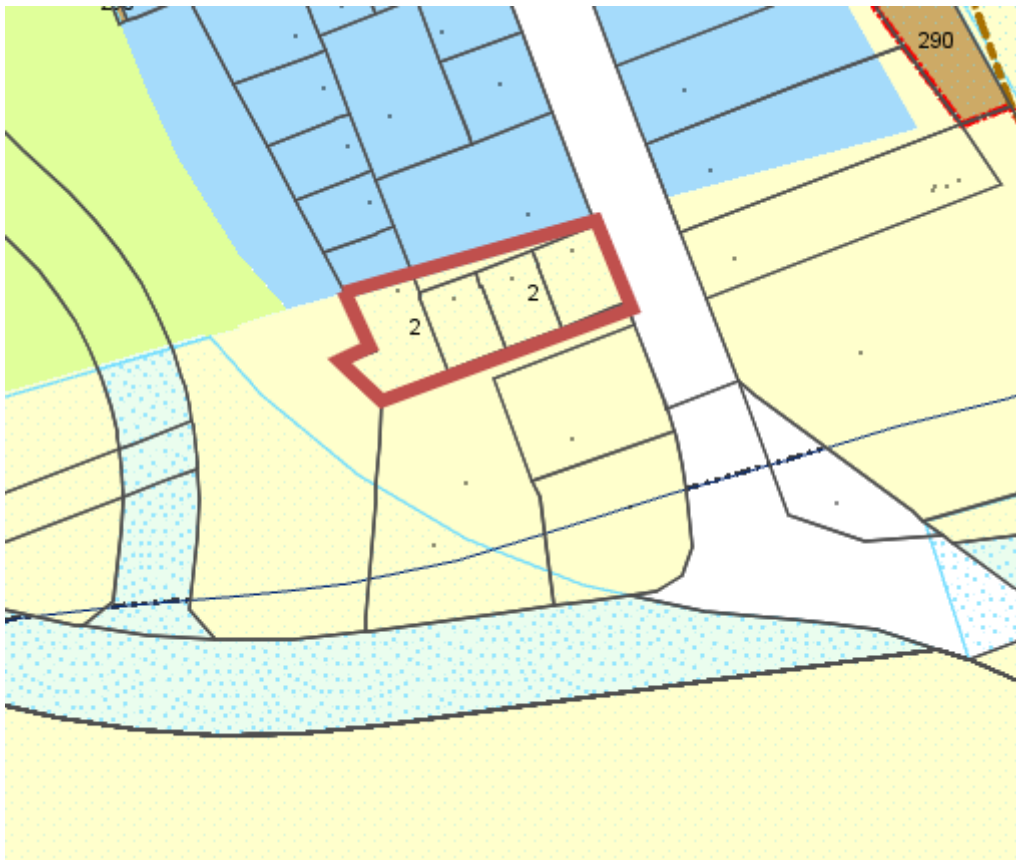
**Figure 28** – Rural Zoning at the southern extent of Glenda Drive (outlined in red). Blue shading illustrates the extent of the ODP Industrial Zone and yellow shading shows the extent of Rural Zone (Legal descriptions - Lot 1 DP 501603, Lot 2 DP 501603, Lot 1 DP 501603).

<sup>98</sup> Aviemore Corporation Ltd (Submission 418)

<sup>99</sup> Para 161, Report 17-6, Report and Recommendations of Independent Commissioners Regarding Mapping of Frankton, Lake Johnson, Tucker Beach Road

<sup>100</sup> RM150784 and RM170342

7.96. The land outlined in red in Figure 29 below were zoned Rural through Stage 1 of the PDP. This land is located at the southern end of Glenda Drive near its intersection with Hawthorne Drive. A resource consent<sup>101</sup> was granted on this land and surrounding sites which created 12 allotments and to enable future buildings and activities to occur on the sites in accordance with the provisions for the ODP Industrial Zone. The Airport designation (ref # 2) was considered as part of this resource consent process and conditions imposed. Therefore, it is considered appropriate that this land be included within the GIZ.



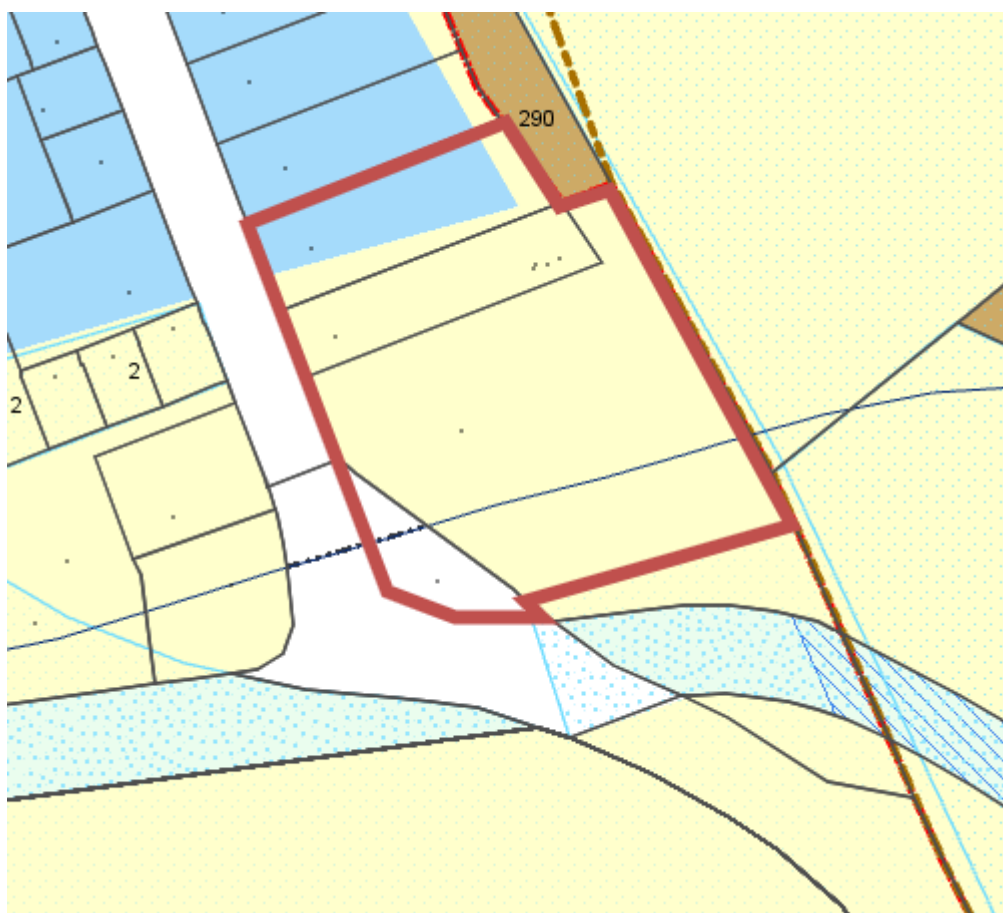
**Figure 29** – Rural Zoning at the southern extent of Glenda Drive (outlined in red). Blue shading illustrates the extent of the ODP Industrial Zone and yellow shading shows the extent of Rural Zone (Legal descriptions - Lot 9 DP 521947, Lot 10 DP 521947, Lot 11 DP 52194, Lot 12 DP 521947, Lot 13 DP 526426).

7.97. The land outlined in red in Figure 30 below were zoned Rural through Stage 1 of the PDP. This land is located at the southern end of Glenda Drive near its intersection with Hawthorne Drive. This area also includes a piece of un-zoned stopped road which is no longer owned by the

<sup>101</sup> RM170559



Council and is no longer used or required for roading purposes. The IHP heard submissions<sup>102</sup> on this land requesting that it be rezoned from Industrial Zone to Business Mixed Use Zone (**BMUZ**). The IHP did not consider the BMUZ appropriate in this location but that the Rural zoning is inappropriate because it does not recognise the existing use or development on the site.<sup>103</sup> The IHP went on to consider an industrial zoning as the appropriate zone for this land and stated that the Council should consider applying an industrial zoning to the land.<sup>104</sup> Therefore, it is considered appropriate that this land be included within the GIZ.



**Figure 30** – Rural Zoning at the southern extent of Glenda Drive including an area of stopped road (outlined in red). Blue shading illustrates the extent of the ODP Industrial Zone and yellow shading shows the extent of Rural Zone (Legal descriptions Lot 1 DP 391483, Lot 2 DP 391483, Section 47 SO 459748).

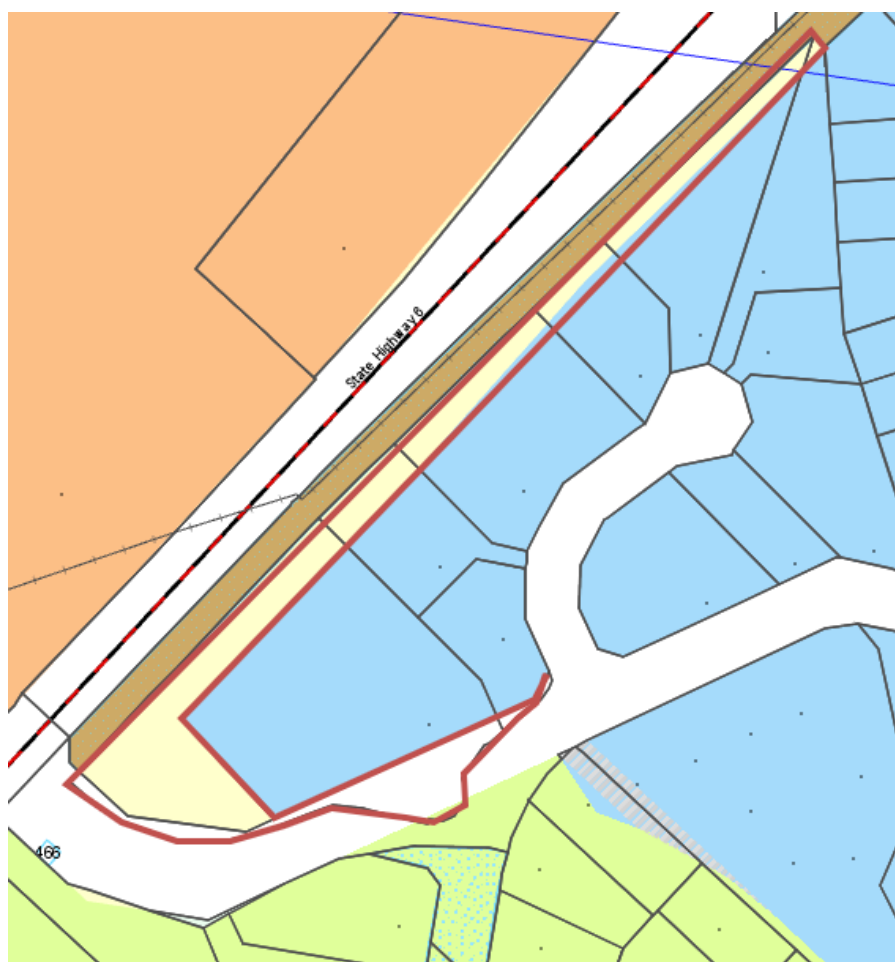
- 7.98. The land outlined in red in Figure 31 below was zoned Rural through Stage 1 of the PDP. This land is located at the northern end of Glenda Drive near its intersection with State Highway 6. This land also includes a piece of un-zoned stopped road which is no longer owned by the Council

<sup>102</sup> Schist Holdings Limited and BNZL Properties Limited (Submissions 488.1 and 488.3)

<sup>103</sup> Para 132, Report 17-6, Report and Recommendations of Independent Commissioners Regarding Mapping of Frankton, Lake Johnson, Tucker Beach Road

<sup>104</sup> Para 134, Report 17-6, Report and Recommendations of Independent Commissioners Regarding Mapping of Frankton, Lake Johnson, Tucker Beach Road

and is no longer used or required for roading purposes. The IHP heard submissions<sup>105</sup> on this land requesting that it be rezoned industrial. The IHP considered it appropriate to change the zoning of the submission sites to an industrial zone because the Rural Zone does not reflect the existing uses of the land nor set an appropriate planning framework for the future.<sup>106</sup> However, the IHP were not able to apply an industrial zone on the basis that it was not part of the PDP at that stage. Therefore, it is considered appropriate that this land be included within the GIZ.



**Figure 31** – Rural Zoning at the northern extent of Glenda Drive (outlined in red). Blue shading illustrates the extent of the ODP Industrial Zone and yellow shading shows the extent of Rural Zone (multiple legal descriptions).

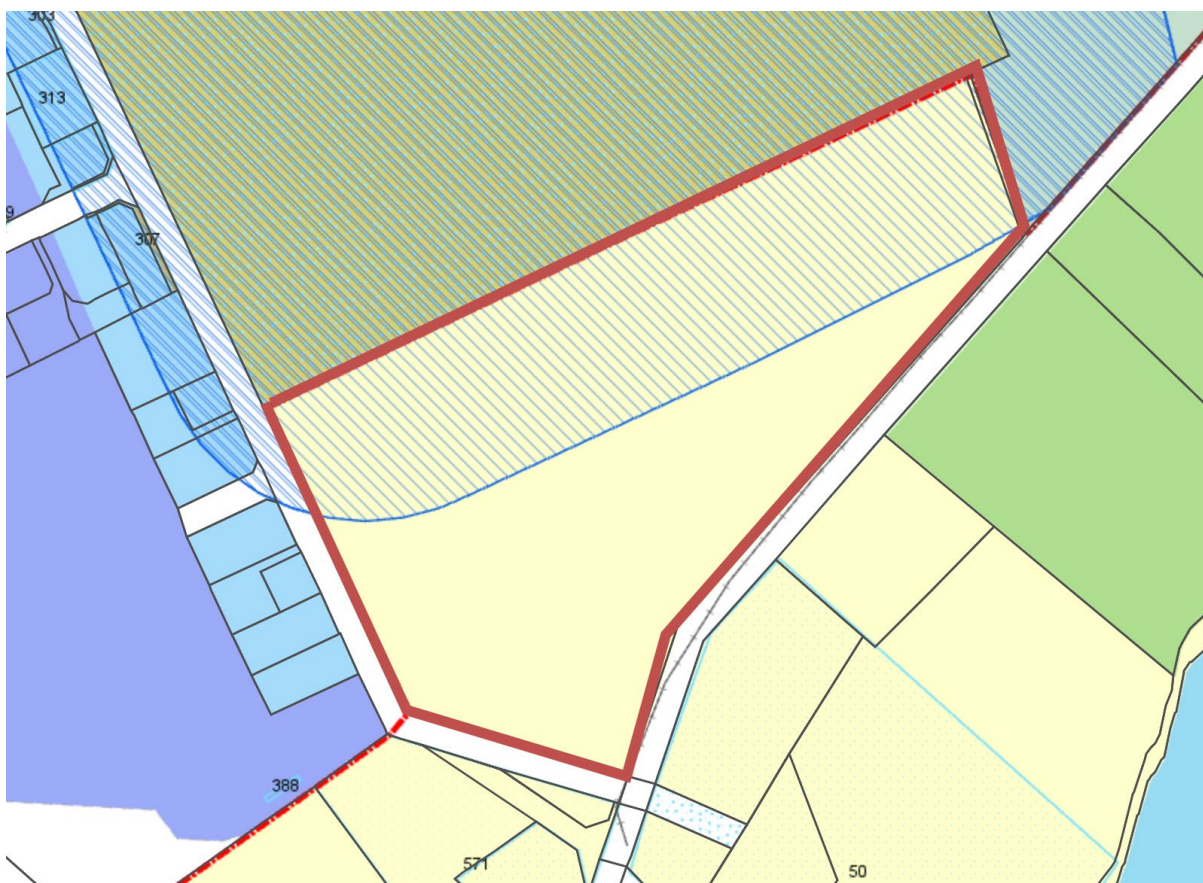
7.99. The land outlined in red Figure 32 below was zoned Rural Industrial Sub-Zone through Stage 2 of the PDP. This land is located at the northern end of Bush Creek Road. The IHP heard a submission<sup>107</sup> on this land requesting that it be rezoned from Rural Lifestyle Zone to Industrial B Zone. The IHP considered that the Rural Lifestyle Zone did not reflect the use of the site as the

<sup>105</sup> Fletcher Distribution Ltd and Mico New Zealand Limited (Submission 344), Reavers NZ Limited (Submission 720)

<sup>106</sup> Para 147, Report 17-6, Report and Recommendations of Independent Commissioners Regarding Mapping of Frankton, Lake Johnson, Tucker Beach Road

<sup>107</sup> Arrow Irrigation (Submission 852)





**Figure 33** – Rural Zone at 135 Ballantyne Road (outlined in red) (Legal description Lot 3 DP 17123).

- a. This site has an area of 12.29 ha. There is a mix of land uses surrounding the site including an Otago Regional Council depot, recycling centre and waste transfer station. The Council operates an animal pound to the south and the Arora substation is located to the south.
- b. The site is currently located outside of the Wānaka UGB which runs along the western boundary fronting Ballantyne Road and along the north western internal boundary where the site adjoins the existing Ballantyne Road Mixed Use Zone. Arora Distribution Lines (Electricity) run generally parallel to the south eastern road boundary of the site where it fronts Riverbank Road. Under the PDP the site is considered to have a landscape classification of 'Rural Character Landscape' (**RCL**).
- c. Resource consent RM160218 (amended by resource consents RM161144, RM171470) authorised the establishment and operation of an Industrial activity on an area located in the north-western extent of the site, being a contractor's yard and buildings. Resource consent RM180746 was approved to extend the contractors yard and add an additional building.



- d. A submission was received on Stage 1 of the PDP review which sought to include the land within the Industrial B Zone.<sup>109</sup> In assessing this submission, the IHP considered that *'it would be possible to accommodate some form of intensive industrial activity on the site'*<sup>110</sup> but were not satisfied that the Industrial B Zone provisions would be appropriate as they were not being considered as part of Stage 1 of the PDP. Further, the IHP disagreed that *'a resource consent for a contractors' yard is of itself sufficiently determinative that potentially higher intensity general industrial activity would also be appropriate'*<sup>111</sup>. The IHP rejected the submission on this basis and recommended that the zoning of this site and whether the UGB should be expanded to include it should be revisited as part of the broader Structure Plan in this area.<sup>112</sup> At the time of writing, there is a live appeal relating to siting of the UGB in relation to IHPs recommendation on this submission.<sup>113</sup>
- e. It is considered appropriate at this time to apply the GIZ to the land at 135 Ballantyne Road and to extend the UGB to include this land. In particular, it is noted that all of the surrounding land on the eastern side of Ballantyne Road, including the Three Parks Special Zone and Ballantyne Road Mixed Use Zone forms part of Stage 3 of the PDP review. As part of this review the zoning of this wider area has been considered strategically as a whole. In addition, the provision framework for the GIZ has been considered and been subject to a section 32 evaluation. The proposed GIZ provisions include measures to address the effects of activities and development within the GIZ where they interact with other zones and gateway routes, and set out variations to Chapter 27 (Subdivision and Development) to ensure appropriate subdivision occurs within sites
- f. The IHP adopted rezoning principles through Stage 1 and 2 of the PDP<sup>114</sup>. This is consistent with Policy 4.2.2.2 which sets out relevant matters that should be considered when allocating land within UGBs.
- g. The development is adjacent to areas serviced by Council's reticulated services. The inclusion of this area within the UGB does not constitute sprawl given the limited extension and is not considered to be sprawling or sporadic<sup>115</sup>. Objective 3.2.2 seeks urban growth that is managed in a strategic and integrated manner. In considering Policy 3.2.2.1 this site would provide for an integrated urban form and will be part of a consolidated industrial zone.

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<sup>109</sup> Submission 249

<sup>110</sup> Para 236, IHP Report 16.2 Stream 12 Upper Clutha Mapping Urban Wanaka and Lake Hawea

<sup>111</sup> Para 236c, IHP Report 16.2 Stream 12 Upper Clutha Mapping Urban Wanaka and Lake Hawea

<sup>112</sup> Para 237, IHP Report 16.2 Stream 12 Upper Clutha Mapping Urban Wanaka and Lake Hawea

<sup>113</sup> Notice of Appeal ENV-2018-CHC-115 Willowridge Development v QLDC

<sup>114</sup> Para 2.14, Strategic Overview And Common Themes, Section 42A Report, Craig Barr, 17 March 2017

<sup>115</sup> Policy 4.2.1.4f 'avoiding sporadic urban development in rural areas and Policy 4.2.2.22e.

- h. The site would have minimal effects in terms of potential for adverse effects on adjoining zones. The inclusion of this site follows an existing urban style use of the land and would provide for retention of land for industrial purposes given the reduction proposed through the inclusion of an Open Space and Recreation Zone on the adjoining site currently zoned BRMUZ. For clarity, the Stage 3 proposals for this site and the adjoining site to the north (Ballantyne Road Mixed Use Zone) result in a net loss of industrial development capacity for Wānaka.
- i. The proposal provides for the existing land use (noting that this is not exclusively determinative<sup>116</sup>), ensures zoning meets the strategic approach set out in the PDP and is consistent with the proposed zoning of the surrounding area.
- j. Relevant to this rezoning is industrial land supply in Wanaka. This proposal allows for additional industrial land acknowledging that some industrial land is being reduced through the proposal to rezone the Ballantyne Road Mixed Use Zone to Open Space - Active Sport and Recreation. Further, it should be acknowledged that within the existing Industrial B zoned land is a site owned by Tussock Rise Limited (TRL). The legal description of this site is Lot 2 Deposited Plan 477622 as contained in Computer Freehold Register 664871. The site has an area of 9.3 ha. Through Stage 1 of the PDP review TRL sought for this land to have a (low-density) residential zoning.<sup>117</sup> Council determined that the submission was not “on” the plan. TRL appealed this decision. The Court’s decision [2019] NZEnvC 111 considered that this submission was on the plan change, and the appeal is therefore live again. The current proposal seeks to retain this land for industrial purposes, however, the outcome of this live appeal produces a degree of uncertainty in regard to future viable industrial development capacity in Wanaka. In addition, and as discussed in the preceeding sections of this report, those capacity calculations provided by the BDCA should be treated as conservative on account of the Council’s revised population projections.

## **8. SCALE AND SIGNIFICANCE EVALUATION**

- 8.1. The level of detailed analysis undertaken for the evaluation of the proposed objectives reflects the scale and significance of the issues considered and whether the proposed objectives and provisions:
- Result in a significant variance from the existing baseline in ODP Industrial Zones.
  - Have effects on matters of national importance.
  - Adversely affect those with specific interests.
  - Involve effects that have been considered implicitly or explicitly by higher order documents.
  - Impose increased costs or restrictions on individuals, communities or businesses.

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<sup>116</sup> Para 2.14, Strategic Overview And Common Themes, Section 42A Report, Craig Barr, 17 March 2017

<sup>117</sup> Submission 395

- Are more appropriate than the existing provisions.
- 8.2. The ODP Industrial Zones have been used as a basis for the revised provisions, with the most notable changes within the proposed rules being those which restrict the establishment of non-industrial type activities from the GIZ, including Office, Retail and Commercial activities (which are not ancillary to Industrial or Service activities), Residential type activities, Visitor Accommodation type activities, Commercial Recreation, Recreation, Community Facilities and Community activities, Trade Suppliers and Large Format Retail activities. The objectives and policies have been revised to provide greater clarity regarding the desired environmental outcomes.
  - 8.3. The format and structure of the ODP Industrial Zone chapters has not been continued; rather the chapter structure developed for the PDP has been used and the tables for activities have been re-ordered.
  - 8.4. An analysis of alternatives has been undertaken, including consideration of the option of retaining the current set of ODP Industrial Zone provisions.

## **9. EVALUATION OF PROPOSED OBJECTIVES SECTION 32(1)(A)**

- 9.1. The identification and analysis of issues has helped define how Section 5 and the rest of the purpose of the RMA applies. This has informed determination of the most appropriate objectives in light of the issues.
- 9.2. Section 32(1)(a) requires an examination of the extent to which the proposed objectives are the most appropriate way to achieve the purpose of the Act as set out in section 5. The following objectives serve to address the key strategic issues in the District:

<b>Proposed Objective</b>	<b>Appropriateness</b>
<p><b>Objective 18A.2.1</b></p> <p>Industrial and Service activities are enabled within the Zone and their long-term operation and viability is supported.</p>	<p>This Objective establishes the framework for enabling Industrial and Service activities within the General Industrial Zone. By specifically enabling Industrial and Service activities the objective is promoting the sustainable management of land within the zone to ensure it is meeting the purpose statement set out at 18A.1 of the chapter. In particular, this objective sets out the goal that land within the Zone will be used and developed for the purpose of establishing, operating and providing for the growth of Industrial and Service activities.</p> <p>Evidence prepared as part of the Council's BDCA relating to industrial development capacity and additional evidence prepared for the purpose of this plan review has shown that the District's industrial economy is growing faster than the rest of the District's economy and that this rate of growth is likely to continue into the future. Businesses which form part of the District's industrial economy, which largely comprise Industrial and Service activities, are expected to contribute substantially to skilled employment opportunities and a diverse economy now and in the future. Given this, it is considered that the Zone will be able to contribute positively to people's social and economic wellbeing and to that of the District more generally. This objective therefore works towards meeting the expectation set out in section 5(2) of Part 2 which requires '<i>managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being</i>'.</p> <p>Section 5(2)(a) of Part 2 states that Council must manage resources in a way which sustains '<i>the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations</i>'. The Council's BDCA and subsequently produced supporting information relating to industrial development capacity, shows that the Council will face challenges in providing the necessary vacant land supply to meet the projected demand for business land over the medium and long term. The objective sets up a clear goal for future land which might be located within the Zone, that it is a location in which Industrial and Service activities are enabled and their operational viability is provided for over the long term. This objective therefore sets up a framework that land within the Zone will be managed, used and developed to support the ongoing industrial land development needs of future generations. The outcome set out in this objective is more direct than that which was provided for within the ODP set of industrial zones.</p>

	<p>The objective recognises and provides the basis for a policy framework to implement the Council's function required under s31 of the RMA, in particular the management of effects of development. The objective gives effect to the Strategic Direction, Urban Development and objectives and policies identified in part 6 of this evaluation.<sup>118</sup></p> <p>For the above reasons the objective is the most appropriate way to achieve the purpose of the RMA.</p>
<p><b>Objective 18A.2.2</b></p> <p>The establishment, operation and growth of Industrial and Service activities within the Zone is not undermined by incompatible land uses.</p>	<p>In contrast to the enabling based goal set out in Objective 18A.2.1, Objective 18A.2.2 establishes that the Zone will also limit, restrict or avoid land uses which are incompatible with the intended outcomes of the Zone. This objective is intended to support Objective 18A.2.1 by establishing the expectation that the ability for Industrial and Service activities to establish, operate and grow within the General Industrial Zone is not undermined by other activities.</p> <p>Evidence referenced through this review process shows that a large proportion of sites within the ODP Industrial zones are occupied by non-industrial type activities, including a large number of Office, Retail and Commercial activities among others. These activities have located within Industrially zoned land for a variety of reasons, but the principle reason is likely to be that there is generally a lack of ready to develop business land in the District and because land in the Industrial Zones is cheaper than other business enabled land such as that located within the Town Centre or Business Mixed Use Zone and equally as accessible to major transport routes and a customer base. The establishment and growth of non-industrial type activities limits the amount of land available for industrial development capacity and can adversely affect the long term viability of Industrial type activities through reverse sensitivity effects. Non-industrial type activities which would be considered incompatible land uses by Objective 18A.2.2 include Office, Retail and Commercial activities that are not ancillary to Industrial or Service activities, Trade Suppliers, Large Format Retail, Residential Activity, Residential Units and Residential Flats, and Visitor accommodation, Residential Visitor accommodation and Homestay activities.</p> <p>By limiting, restricting or avoiding these incompatible land uses, Objective 18A.2.2 is appropriate to achieve the purpose of the Act. In particular, the objective would achieve sustainable management by ensuring that Industrial and Service activities are not undermined by incompatible activities that locate within the Zone which could equally, locate elsewhere to meet their needs. This objective therefore aims to ensure that the General Industrial Zone is managing land in a way which enables the industrial economy to operate and grow in manner which provides for the ongoing social and economic wellbeing of people and communities within the District.</p> <p>The objective recognises and provides the basis for a policy framework to implement the Council's function required under s31 of the RMA, in particular the management of effects of development. The objective gives effect to the Strategic Direction and Urban Development objectives and policies identified in part 6 of this evaluation.<sup>118</sup></p> <p>For the above reasons the objective is the most appropriate way to achieve the purpose of the RMA.</p>

<sup>118</sup> Sections 6.18 and 6.19

<p><b>Objective 18A.2.3</b></p> <p>Activities and development within the Zone provide a level of amenity which make it a pleasant, healthy and safe place to work in and visit.</p>	<p>This Objective is the most appropriate way to achieve section 5(2) of the Act as it will ensure that the land resource located within the General Industrial Zone is being used and developed in a way ‘...<i>which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety...</i>’. In addition, the Objective is considered the most appropriate way to achieve Section 7(c) of Part 2 which sets out that particular regard shall be given to ‘<i>the maintenance and enhancement of amenity values</i>’ in managing the use, development and protection of natural and physical resources.</p> <p>This Objective seeks to ensure that land within the General Industrial Zone is a place in which people feel comfortable to work within and visit. While the Zone is recognised as a location in which activities have more flexibility to create noise, odour, heavy traffic movements and other effects, it also aims to ensure the Zone is recognised as a place of human activity, employment and trade. It does this by setting out the expectation that sites are used in ways which provide for pleasant, healthy and safe human experiences. This type of experience is important to people’s mental health, particularly people who work within the zone, which is increasingly recognised as an important part of social well-being.</p> <p>The objective recognises and provides the basis for a policy framework to implement the Council’s function required under s31 of the RMA, in particular the management of effects of development. The objective gives effect to the Strategic Direction and Urban Development objectives and policies identified in part 6 of this evaluation.<sup>118</sup></p> <p>For the above reasons the objective is the most appropriate way to achieve the purpose of the RMA.</p>
<p><b>Objective 18A.2.4</b></p> <p>Activities and development within the Zone are undertaken in a way that does not adversely affect the amenity of other zones</p>	<p>While Objective 18A.2.3 seeks to focus achieving a desired amenity outcome within the Zone itself, Objective 18A.2.4 sets out a desired amenity outcome in regard to the way the General Industrial Zone interacts with other zones. In particular, the Objective anticipates that activities and development within the Zone will be established and operate in a manner capable of not adversely affecting the existing level of amenity present in other zones.</p> <p>This objective is considered the most appropriate way to achieve the purpose of the Act (section (2)) as well as section 7 Other Matters (section 7(c)) as it has particular regard to amenity values and how the experience of these values can affect the social, economic and cultural well-being, as well as the health and safety, of people and communities who might own land, live or operate businesses in other zones which might adjoin or be located in close proximity to the General Industrial Zone. In particular, it acknowledges that people and communities within these ‘other zones’ anticipate a level of amenity consistent with the purpose of that zone and the type of activities and development it provides for as of right. More often than not, the type of activities and development provided for within these ‘other zones’ will be sensitive to the type of effects that might commonly be accepted within land zoned for industrial purposes. Therefore, the Objective conceives that activities and development on land within the General Industrial Zone will be managed in a way that avoids, remedies or mitigates adverse effects on the environment (section 5(2)(c)) such that the level of amenity experienced on other zones will be not be adversely affected.</p>

	<p>The objective recognises and provides the basis for a policy framework to implement the Council's function required under s31 of the RMA, in particular the management of effects of development. The objective gives effect to the Strategic Direction and Urban Development objectives and policies identified in part 6 of this evaluation.<sup>118</sup></p> <p>For the above reasons the objective is the most appropriate way to achieve the purpose of the RMA.</p>
<p><b>Objective 27.3.13</b></p> <p>Subdivision within the General Industrial Zone enables the establishment, operation and long term viability of Industrial and Service activities which cannot locate elsewhere in this District, including those Industrial and Service activities which require larger buildings and more space for the purpose of manoeuvring, loading and vehicle parking.</p>	<p>This Objective is the most appropriate way to achieve section 5(2) of the Act as it aims to ensure that subdivision activities within the General Industrial Zone are being undertaken in a manner and at a rate which enables people and communities to provide for their social and economic. In particular, it seeks to ensure that subdivision within the Zone enables the establishment, operation and long term viability of Industrial and Service activities. Evidence prepared as part of the Council's BDCA relating to industrial development capacity and additional evidence prepared for the purpose of this plan review has shown that the District's industrial economy is growing faster than the rest of the District's economy and that this rate of growth is likely to continue into the future. Businesses which form part of the District's industrial economy, which largely comprise Industrial and Service activities, are expected to contribute substantially to skilled employment opportunities and a diverse economy now and in the future. Given this, it is considered that subdivision activities consistent with this objective will contribute positively to people's social and economic wellbeing and to that of the District more generally and assist in ensuring that land within the Zone will meet the reasonably foreseeable needs of future generations.</p> <p>The objective recognises and provides the basis for a policy framework to implement the Council's function required under s31 of the RMA, in particular the management of effects of development. The objective gives effect to the Strategic Direction and Urban Development objectives and policies identified in part 6 of this evaluation.<sup>118</sup></p> <p>For the above reasons the objective is the most appropriate way to achieve the purpose of the RMA.</p>

## 10. EVALUATION OF THE PROPOSED PROVISIONS SECTION 32(1)(B)

10.1. The following tables consider whether the proposed provisions are the most appropriate way to achieve the relevant objectives. In doing so, it considers the costs and benefits of the proposed provisions and whether they are effective and efficient. The evaluation below proposed also sets out the resource management issues being addressed by the provisions, *which* have been described in more detail in the preceding sections of this evaluation.

### **Part 1:**

Issue 1 - Understanding the District's industrial economy

Issue 2 - Non-industrial activities within the Industrial Zones

Issue 3 - Industrial Development Capacity

**Objective 18A.2.1** - Industrial and Service activities are enabled within the Zone and their long-term operation and viability is supported.

A summary of proposed provisions and components of the General Industrial Zone that address these issues and give effect to the objective:

Policies:

- 18A.1.1.1 Enable a diverse range of Industrial and Service activities that provide benefit in the form of economic growth and skilled employment opportunities.
- 18A.1.1.2 Enable Office, Retail and Commercial activities that are ancillary to Industrial or Service activities.
- 18A.1.1.3 Enable the operation of food and beverage retail activities which serve the daily needs and convenience of workers and visitors to the Zone.
- 18A.1.1.4 Recognise that Industrial and Service activities have the potential to create noise, glare, dust, odour, shading, traffic effects and other effects that can be incompatible with activities that are enabled in adjacent or nearby non-industrial zones.
- 18A.1.1.5 Manage subdivision and development within the Zone to ensure that sites are well suited to serving the needs of a diverse range of Industrial and Service activities now and into the future.

Matters addressed in the Activities Table:

- 18A.4.1 – provides for Industrial and Service activities as permitted activities
- 18A.4.2 – provides for ancillary Office, Retail and Commercial activities as permitted activities
- 18A.4.3 – provides for the Commercial sale of food and beverages as permitted activities
- 18A.4.4 – provides for Outdoor Storage as a permitted activity
- 18A.4.5 – provides for Buildings as restricted discretionary activities



Matters addressed in the Standards Table:

- 18A.5.1 – standards for ancillary Office, Retail and Commercial activities
- 18A.5.2 – standards for the Commercial sale of food and beverages
- 18A.5.3 – minimum boundary setbacks
- 18A.5.4 – maximum building coverage
- 18A.5.5 – maximum building height

Matters addressed in the non-notification clause

- 18A.6.1.1 – restricted discretionary activity buildings not requiring written approval and shall not be notified or limited notified
- 18A.6.1.2 – restricted discretionary ancillary Office, Retail and Commercial activities not requiring written approval and shall not be notified or limited notified

A summary of proposed provisions and components of the Noise chapter (Chapter 36) that have been varied address these issues and give effect to the objective:

Matters addressed in 36.5 Rules – Standards, Table 3 – Specific Standards

- 36.5.15 – identifies noise standards relating to activities operating within the General Industrial Zone – noise limits only apply when sound is received in another zone

A summary of proposed provisions and components of the Earthworks chapter (Chapter 25) that have been varied address these issues and give effect to the objective:

Matters addressed in Table 25.5 – Rules – Standards

- 25.5.5 – identifies maximum permitted disturbance volume of earthworks for the General Industrial Zone

<b><i>Costs</i></b>	<b><i>Benefits</i></b>	<b><i>Effectiveness &amp; Efficiency</i></b>
<b>Environmental and Social</b> <ul style="list-style-type: none"> <li>• Industrial and Service activities may create effects such as noise, odour, heavy traffic movements and other effects that can be</li> </ul>	<b>Economic and Social</b> <ul style="list-style-type: none"> <li>• The provision of Industrial and Service activities within the General Industrial Zone as permitted activities together</li> </ul>	<b>Effectiveness and efficiency</b> <p>Providing for Industrial and Service activities within the Zone as permitted activities establishes the expectation</p>

<p>incompatible with more sensitive activities. It is noted that previous consenting processes under the ODP provisions have enabled the establishment of a number of land use activities, including Residential, Visitor Accommodation, Office, Commercial and Retail activities, which are considered sensitive to the type of effects that might be produced by activities anticipated within the Zone. By providing a generally enabling framework for Industrial and Service activities (in regard to setbacks, building coverage and building height, outdoor storage, along with those variations to Chapter 36 – Noise (standards for noise within the Zone), and to Chapter 25 – Earthworks (permitted earthworks volume) among others, there is the potential for these already established more sensitive activities within the Zone to experience adverse environmental and social effects that could negatively impact their wellbeing.</p> <ul style="list-style-type: none"> <li>• It is proposed to increase the activity status for Buildings from controlled to restricted discretionary. This change will increase the degree of uncertainty for owners of land within the Zone in terms of the possible outcome of a consent application. It will also increase the time and cost associated with the processing of resource consents.</li> </ul>	<p>with a generally enabling set of associated standards is consistent with the current approach within the existing Industrial Zones and provides landowners and business owners certainty that land within the Zone can continue to be used for these activities as of right.</p> <ul style="list-style-type: none"> <li>• By enabling Industrial and Service activities through a permitted activity standard, the use and development of land within the Zone will be promoted for these activities. This provision will therefore contribute to the economic wellbeing of the District by enabling land within the Zone to be used for a diverse range of business activities that play an important and growing role within the District’s economy, in particular, through the creation of skilled employment opportunities and by contributing to the supply chain by offering other businesses in the District with products and services that are necessary for their operation and growth.</li> <li>• By making Industrial and Service activities permitted, the Zone framework presents the simplest, most certain, and cheapest opportunity for these activities to establish within the Zone by not</li> </ul>	<p>that land will be used for activities and development associated with these activities. This provision is therefore effective and efficient in achieving Objective 18A.2.1 which sets out a desired end state for the Zone in which Industrial and Service activities are ‘enabled’.</p> <p>The proposed standards, particularly those related to setbacks, building coverage and building height, outdoor storage, along with those variations to Chapter 36 – Noise (standards for noise within the Zone), and to Chapter 25 – Earthworks (permitted earthworks volume) provide an appropriate degree of flexibility such that Industrial and Service activities can utilise sites within the Zone without unnecessary restrictions and in a way or at a rate which reasonably effectively and efficiently suits their functional needs.</p> <p>Provisions enabling ancillary Office, Retail and Commercial activities are considered to be the most appropriate, effective and efficient way to achieve Objective 18A.2.1 as they signal that ancillary Office, Retail and Commercial activities are anticipated within the Zone. The provision recognises and provides for the capacity for ancillary Office, Retail and Commercial activities to support the long term operation and viability of Industrial and Service activities.</p> <p>The provision enabling the operation of commercial sale of food and beverages will effectively and efficiently support the long term operation and viability of Industrial and Service activities within the Zone by ensuring there is provision for employees and other</p>
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<ul style="list-style-type: none"> <li>• By enabling the establishment and operation of ancillary Office, Retail and Commercial activities along with activities involving the commercial sale of food and beverages, the Zone may attract a greater number of visitors involved in the purchase of goods and services from these activities. This has the potential to increase demand on the roading network along with additional possible pedestrian movements in locations and sites where provision for pedestrian movement is not effectively provided.</li> <li>• Non-notification clauses have been included in the proposed provisions in respect to restricted discretionary activities relating to Buildings and ancillary Office, Retail and Commercial activities. Non-notification clauses have the capacity to exclude possibly effected persons from being considered in resource consenting processes.</li> </ul>	<p>triggering the need for a resource consent process.</p> <ul style="list-style-type: none"> <li>• The provisions permitting ancillary Office, Retail and Commercial activities will enable the establishment and operation of non-industrial related activities which directly support Industrial or Service activities operating within the Zone albeit on a limited scale through the requirement of them being 'ancillary'. This provision will provide economic benefit to businesses as it recognises that Office, Retail and Commercial activities can provide supplementary income and an important supporting function for Industrial and Service activities without necessarily displacing the Industrial and Service activities that are at the core of the zones purpose.</li> <li>• By enabling ancillary Office, Retail and Commercial activities the provisions will positively contribute to the economic and social vibrancy of the Zone by introducing a controlled degree of diversity in terms of activity types occurring within sites. A non-notification clause is also specified for these ancillary activities where they require a restricted discretionary resource consent, therefore consent applications will not</li> </ul>	<p>people visiting the Zone with places to purchase food and beverages.</p> <p>Policy 18A.2.1.5 sets out that Industrial and Service activities have the potential to create a range of effects that can be incompatible with activities that might be enabled in other zones. This policy is effective and efficient in achieving Objective 18A.2.1 in that it seeks to ensure the type of effects which may be associated with Industrial and Service activities should be accommodated within the Zone as this may be one of a very limited number of locations in which an activity with these effects can be located. By recognising that these effects can be tolerated within the Zone, Policy 18A.2.1.5 supports the long term operation and viability of Industrial and Service activities.</p> <p>The variations to Chapter 25 (Earthworks) and Chapter 36 (Noise) are effective as they ensure that the General Industrial Zone is appropriately identified within the new District Plan in order to assist QLDC in carrying out its functions and in achieving the purpose of the Act.</p>
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	<p>need to proceed through potentially time consuming and costly notified or limited notified consent proceedings.</p> <ul style="list-style-type: none"> <li>• The provision enabling the commercial sale of food and beverage activities has the capacity to contribute positivity to social and economic wellbeing by adding to the vibrancy of the Zone, thereby promoting the Zone as a desirable place to work and visit.</li> <li>• Buildings within the Zone are provided for as Restricted Discretionary activities with a clear set of matters of discretion. In addition, a clause within the Chapter ensures that the written approval of other persons shall not be required and that applications shall not be notified or limited notified in relation to Buildings within the Zone. These provisions are the most appropriate way to achieve Objective 18.2.1 in that they effectively and efficiently signal to land owners that industrial buildings are anticipated within the Zone and, assuming compliance with other relevant standards, consent applications will not need to proceed through potentially time consuming and costly notified or limited notified consent proceeding.</li> </ul>	
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Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):	
<b>Option 1:</b> Retain the operative provisions	<ul style="list-style-type: none"> <li>• Would not address the identified issues with the operative provisions.</li> <li>• Would lead to inconsistency in drafting style in the PDP, and rather would result in a continuation of the complex drafting style of the ODP.</li> <li>• Would not provide the opportunity to introduce a policy framework and standards which have a greater capacity to enable the long term operation and viability of Industrial and Service activities within the District and secure the range of economic benefits that the industrial economy is known to provide.</li> </ul>
<b>Option 2:</b> Identify large areas of additional land to be included within the Zone in order to enable additional Industrial and Service activities to establish within the District without amending operative provisions	<ul style="list-style-type: none"> <li>• While this option would facilitate the provision of additional industrial development capacity within the District, it would not necessarily provide for the long term operation and viability of Industrial and Service activities principally because it would not address the identified issues with the operative provisions.</li> <li>• In identifying large areas of additional land to be included within the Zone, the review process would be preceding those opportunities afforded by the Future Development Strategy work being undertaken by the Council in collaboration with other agencies. This work provides the opportunity to assess long term land allocation for industrial development capacity in a more holistic manner.</li> <li>• There are few locations within the District which are well suited to being zoned for industrial purposes.</li> </ul>
<b>Option 3:</b> Relax and remove controls on activities and development within the existing Industrial Zones in order to enable Industrial and Service activities to occur in a more flexible and permissive manner	<ul style="list-style-type: none"> <li>• This option may enable the establishment, operation and growth of Industrial and Service activities that have the potential to adversely affect environmental, social and cultural wellbeing.</li> <li>• This option may result in other activities establishing within the Zone which remove vacant land for industrial development capacity or the transition of existing Industrial and Service activities to other activities which do not form part of the District's industrial economy.</li> </ul>

## **Part 2:**

Issue 1 - Understanding the District's industrial economy

Issue 2 - Non-industrial activities within the Industrial Zones

Issue 3 - Industrial Development Capacity

**Objective 18A.2.2** - The establishment, operation and growth of Industrial and Service activities within the Zone is not undermined by incompatible land uses.

A summary of proposed provisions and components of the General Industrial Zone that address this issue and give effect to the objectives:

### **Policies**

18A.2.2.1 Avoid the following activities that are not compatible with the primary function of the Zone and have the ability to displace or constrain the establishment, operation and long term viability of Industrial and Service activities:

- a. Office, Retail and Commercial activities that are not ancillary to Industrial or Service activities
- b. Trade Suppliers
- c. Large Format Retail
- d. Residential Activity, Residential Units and Residential Flats, and
- e. Visitor accommodation, Residential Visitor accommodation and Homestay activities.

18A.2.2.2 Avoid the cumulative establishment of activities and development within the Zone that would undermine the role played by town centre and other key business zones as the District's strategic hubs of economic activity.

18A.2.2.3 Limit the scale, location and function of Office, Retail and Commercial activities to ensure they are ancillary to Industrial or Service activities.

18A.2.2.4 Ensure all Office, Retail and Commercial activities are constructed and operated to mitigate adverse reverse sensitivity effects to Industrial or Service activities.

18A.2.2.5 Limit the scale, location and function of food and beverage related commercial activities within the Zone to ensure they serve the direct needs of workers and visitors to the Zone or directly relate to and support the operation of an Industrial activity.

Matters addressed in the Activities Table:

- 18A.4.2 – provides for ancillary Office, Retail and Commercial activities as permitted activities (subject to limits in standards table)
- 18A.4.3 – provides for the Commercial sale of food and beverages as permitted activities (subject to limits in standards table)
- 18A.4.5 – provides for Buildings as restricted discretionary activities (note matter of discretion relating to ancillary Office, Retail and Commercial activities)
- 18A.4.8 – identifies Commercial Recreation and Recreation activities as non-complying activities
- 18A.4.9 – identifies Community Activities and Community Facilities as non-complying activities

- 18A.4.11 – identifies activities not listed as non-complying activities
- 18A.4.12 – identifies Trade Suppliers and Large Format Retail activities as prohibited activities
- 18A.4.14 – identifies Office, Retail and Commercial activities not otherwise identified as prohibited activities
- 18A.4.15 – identifies Residential activities, Residential Units and Residential Flats as prohibited activities
- 18A.4.16 – identifies Visitor Accommodation, Residential Visitor Accommodation and Homestay activities as prohibited activities
- 18A.4.17 – identifies Airports as prohibited activities
- 18A.4.18 – identifies Mining as a prohibited activity

Matters addressed in the Standards Table:

- 18A.5.1 – standards for ancillary Office, Retail and Commercial activities
- 18A.5.2 – standards for the Commercial sale of food and beverages

A summary of proposed provisions and components of the Noise chapter (Chapter 36) that have been varied address this issue and give effect to the objective:

Matters addressed in Table 36.7 – Ventilation requirements for other Zones (Table 5)

- Table 5 – identifies critical listening environments located within the General Industrial Zone as needing to meet the standards of Table 5.

<b>Costs</b>	<b>Benefits</b>	<b>Effectiveness and efficiency</b>
<b>Economic</b> <ul style="list-style-type: none"> <li>• The proposed provisions impose more limits and restrictions on the establishment and operation of non-industrial type activities, including Office, Retail, and Commercial, activities. The provisions restrict or prohibit other non-industrial related activities including Commercial Recreation, Recreation, Community activities, Community Facilities, Trade Suppliers, Large Format Retail, Residential activities, Visitor Accommodation, Residential Visitor</li> </ul>	<b>Economic</b> <ul style="list-style-type: none"> <li>• By not anticipating or excluding non-industrial and service type activities from establishing and/or operating within the Zone, the proposed provisions improve the likelihood that land within the Zone is available for the establishment and operation of Industrial and Service activities. Further, these provisions assist in limiting the effects that non-industrial type activities can play in displacing or constraining Industrial and Service</li> </ul>	<p>The proposed provisions are considered to be the most appropriate and effective and efficient way to achieve Objective 18A.2.2. In particular, the policies and associated rules set out the expectation that non-industrial type activities are not anticipated or are excluded from establishing and/or operating within the Zone. These non-industrial type activities play a central role in displacing and/or constraining Industrial and Service activities and limit the availability of land with the Zone for industrial development capacity. The proposed provision framework will be capable of managing the use and development of land within the</p>

<p>Accommodation, and Homestay Activities. The default status for other activities which are not listed within the activity table (Table 18A.4) is non-complying. In applying these provisions, these activities are signalled as not being anticipating or excluded from establishing and/or operating within the Zone. These provisions therefore represent an economic cost to people who own land within the Zone as these non-industrial type activities may have the potential to generate greater returns to landowners than Industrial and Service activities.</p> <ul style="list-style-type: none"> <li>The proposed variation to Chapter 36 (Noise) will impose costs for any landowner or business operator who seeks to establish activities within the Zone which include Critical Listening Environments. These additional costs would be incurred in meeting the ventilation requirements set out within Table 5 of Chapter 36 for any Critical Listening Environments.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>In signalling a large number of non-industrial or service activities as not being anticipated or as being excluded from establishing and/or operating within the Zone, there is a risk that land located within the Zone is developed such that somewhat limited diversity occurs in terms of business functions. A possible cost of this limited</li> </ul>	<p>activities through reverse sensitivity effects and by increasing the value of the limited land resource currently located within the Zone. In addressing these outcomes, the provisions will contribute to the economic wellbeing of the District by enabling land within the Zone to be used for business activities that play an important and growing role within the District's economy, in particular, through the creation of a range of skilled employment opportunities and by contributing to the supply chain of other businesses within the District.</p> <ul style="list-style-type: none"> <li>By not anticipating or excluding non-industrial and service type activities from establishing and/or operating within the Zone, the proposed provisions seek to avoid the General Industrial Zone becoming a focus for customer related Retail and Commercial activities. This approach will support and enable the role of other key business zones within the District as strategically defined and located hubs of economic activity.</li> <li>The suite of provisions associated with this objective assists the Council in meeting its obligations under the NPS UDC in respect to the provision of land for industrial development capacity. The proposals provide a framework for the</li> </ul>	<p>Zone such that the establishment, operation and growth of Industrial and Service activities is not undermined by incompatible land uses.</p> <p>In addition, it is considered that the proposed framework strikes an effective balance in defining the scale, nature and function of non-industrial activities that may be able to occur within the Zone without undermining the establishment, operation and growth of Industrial and Service activities. Achieving this balance is important in measuring the effectiveness and efficiency of provisions as they need to weigh up the implications of the environmental, social, cultural and economic costs. In particular, the provisions are considered effective as they recognise and provide for a threshold against which non-industrial activities (ancillary Office, Retail, Commercial, and the Commercial sale of food and beverages) can be measured and beyond which activities are considered inappropriate within the Zone.</p> <p>The variation to Table 5 of Chapter 36 (Noise) also ensures that the General Industrial Zone is appropriately identified within the new District Plan in order to assist QLDC in carrying out its functions and in achieving the purpose of the Act.</p>
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<p>diversity is that the attractiveness of the Zone to landowners, business operators and employees may be reduced as they may prefer to be sited in locations that offer more diverse experiences.</p>	<p>use of land that might be identified for inclusion within the Zone as part of future private or Council initiated plan changes or related policy processes (i.e. the Future Development Strategy) in a way or at a rate that will positively benefit the District's economic wellbeing by providing for land within the Zone to be used in a manner that is not undermined by incompatible land uses.</p>	
<p><b>Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):</b></p>		
<p><b>Option 1:</b> Retain the operative provisions</p>	<ul style="list-style-type: none"> <li>• Would not address the identified issues with the operative provisions.</li> <li>• Would lead to inconsistency on drafting style in the PDP, and rather would result in a continuation of the complex drafting style of the ODP.</li> <li>• Would not provide the opportunity to introduce a policy framework and standards which have a greater capacity to manage the establishment activities within the Zone which undermine the establishment, operation and growth of Industrial and Service activities.</li> </ul>	
<p><b>Option 2:</b> Prohibit all activities within the Zone apart from Industrial and Service activities</p>	<ul style="list-style-type: none"> <li>• Prohibiting all other activities from the Zone would not recognise the nuanced relationships that Industrial and Service activities have with other non-industrial type activities. These relationships are important to the viability of Industrial and Service activities, and prohibiting them from the Zone all together may adversely affect the District's industrial economy.</li> <li>• This option would not properly recognise the nature and characteristics of the District's industrial economy. In particular, the District's industrial economy would not be considered 'heavy'. It may be appropriate to prohibit all incompatible non-industrial type land uses from a zone that serves heavy industry, but it could not be justified within a zone that comprises a greater mix and diversity of industrial type activities which may often rely on the support of ancillary Office, Retail or Commercial activities.</li> <li>• This option would exclude the provision of activities from the Zone which serve the daily needs of people who work within or visit the Zone such as activities involving the commercial sale of food and beverages. It is important that these activities are provided for within business zones to ensure that people are not</li> </ul>	

	<p>required to travel significant distances to purchase food and beverages for their breakfast, lunch or dinner needs. These activities also offer opportunities for social and cultural interaction and wellbeing.</p>
<p><b>Option 3:</b> Identify large areas of additional land to be included within the Zone in order to counter the effect of non-industrial type activities from establishing within the Zone without amending operative provisions</p>	<ul style="list-style-type: none"> <li>• While this option would facilitate the provision of additional industrial development capacity within the District, it would not necessarily avoid the effect non-industrial activities have on the availability of this land for the establishment, operation and growth of Industrial and Service activities. This is because industrial land is commonly cheaper than other business enabled land such as town centre zones or the Business Mixed Use Zone and as such will always present attractive opportunities for non-industrial activities that may also be capable of greater profit margins.</li> <li>• In identifying large areas of additional land to be included within the Zone, the review process would be preceding those opportunities afforded by the Future Development Strategy work being undertaken by the Council in collaboration with other agencies. This work provides the opportunity to assess long term land allocation for industrial development capacity in a more holistic manner.</li> <li>• There are few locations within the District which are well suited to being zoned for industrial purposes.</li> </ul>

Issue 5 - Minimum lot size within the Industrial Zones

**Note – The following objective and policies are variations to Chapter 27 (Subdivision and Development) (additions are underlined):**

**Objective 27.3.13** - Subdivision within the General Industrial Zone enables the establishment, operation and long term viability of Industrial and Service activities which cannot locate elsewhere in this District, including those Industrial and Service activities which require larger buildings and more space for the purpose of manoeuvring, loading and vehicle parking.

A summary of proposed provisions and components of the Subdivision and Development Chapter that address this issue and give effect to the objectives (additions are underlined):

Policies

- 27.3.13.1 Enable subdivision and development within the General Industrial Zone that provides for the establishment, operation and long term viability of Industrial and Service activities by ensuring any new lots created are capable of accommodating activities and development that is anticipated by the Zone standards.
- 27.3.13.2 Recognise and provide for subdivision activities which create smaller lot sizes than anticipated within the General Industrial Zone where there is a demonstrated need for Industrial and Service activities on lots of that size and where it can be shown that the lots could viably provide for their long term functional needs.
- 27.3.13.3 Ensure any new subdivision provides adequate road access, onsite parking, loading and manoeuvring suitable for the activities anticipated to establish within the lots.
- 27.3.13.4 Ensure any new subdivision integrates well with current and future transport networks, including roads and public and active transport systems by managing the functional layout and arrangement of lots and their access.
- 27.3.13.5 Ensure subdivision only occurs where the necessary infrastructure exists to service the lots.
- 27.3.13.5 Avoid subdivision that creates lots of a size and layout that limit the intended function of the General Industrial Zone to provide for the long term establishment, operation and long term viability of Industrial and Service Activities.

Connell Terrace Structure Plan

- 27.3.13.6 Ensure subdivision is consistent with the Connell Terrace Structure Plan by requiring:
  - a. landscaping and on-going maintenance of the Building Line Restriction Area shown on the Connell Terrace Structure Plan;
  - and
  - b. a roading layout that is consistent with the Connell Terrace Structure Plan.

Ballantyne Road Structure Plan

- 27.3.13.7 Ensure subdivision is consistent with the Ballantyne Road Structure Plan by requiring:
  - a. landscaping and on-going maintenance of the Building Line Restriction Area shown in the Ballantyne Road Structure Plan;
  - and

b. a roading layout that is consistent with the Ballantyne Road Structure Plan.

Matters addressed in 27.5 Rules – Subdivision (Chapter 27 Subdivision and Development):

- 27.5.7 – Identifies all subdivision within the General Industrial Zone as a restricted discretionary activity

Matters addressed in 27.6 Rules – Standards for minimum lot areas (Chapter 27 Subdivision and Development):

- 27.6.1 – specifies the minimum lot area in the General Industrial Zone as 1000m<sup>2</sup>. Provides for sites between 1000m<sup>2</sup> – 500m<sup>2</sup> as a Discretionary activity. Specifies subdivision that produces sites less than 500m<sup>2</sup> in area as non-complying activities.

Matters addressed in 27.7 Zone and location specific Rules – (Chapter 27 Subdivision and Development):

- 27.7.10 – specifies standards for subdivision in the area contained within the Connell Terrace Structure Plan
- 27.7.11 – specifies standards for subdivision in the area contained within the Ballantyne Road Structure Plan

<b>Costs</b>	<b>Benefits</b>	<b>Effectiveness and efficiency</b>
<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• By increasing the minimum lot size within parts of the existing Industrial Zones the proposed provisions will limit the capacity to create smaller lots. This may have an economic cost for landowners as they may be able to sell a greater number of smaller lots for more profit than a smaller number of larger lots.</li> <li>• It is known that the District's industrial economy contains a large proportion of smaller businesses<sup>119</sup> that employ only a small number of people. These smaller businesses may seek smaller lots as they</li> </ul>	<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• The proposed framework of provisions seeks to ensure that new lots created within the Zone are capable of accommodating the functional needs of a wide range of Industrial and Service activities and conversely, to avoid the creation of lots that are not practical for this purpose. Lots created under this framework will assist in enabling the establishment, operation and growth of Industrial and Service activities within the Zone and contribute to the economic wellbeing of the District. This will occur by promoting the creation of lots to be</li> </ul>	<p>The proposed provision framework is considered to be the most appropriate and effective and efficient way to achieve Objective 27.3.13. In particular, the provisions set out a clear expectation that new sites within the Zone are to be created to enable the establishment, operation and long term viability of Industrial and Service activities. This outcome is achieved principally by setting a minimum lot area that is capable of providing for a diverse range of Industrial and Service activities to operate without undue restrictions relating in particular to the scale of buildings which may be required to accommodate activities and additional area required for the movement of heavy vehicles.</p>

<sup>119</sup> Section 7.12 of this report

<p>may present more affordable opportunities to purchase land within the Zone. Therefore, increasing the minimum lot size within parts of the Zone may make purchasing land within the Zone less affordable for smaller Industrial or Service activities.</p>	<p>used for business activities that are known to play an important and growing role within the District's economy, in particular, through the creation of a diverse range of skilled employment opportunities and by contributing to the supply chain by offering other businesses in the District with products and services that are necessary for their operation and growth.</p> <ul style="list-style-type: none"> <li>• The proposed framework provides for smaller lots to be created through subdivision activities where there is a demonstrated need for Industrial and Service activities on sites of that size and where it can be shown that the lots could viably provide for their long term functional needs. This framework may therefore provide a pathway for smaller Industrial and Service activities to purchase land located within the Zone.</li> </ul> <p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• The proposed framework of provisions set out an expectation that subdivision activities will provide for adequate access and onsite provision for parking, loading and manoeuvring. Further, the provisions ensure that subdivided lots will integrate well with the function, arrangement and layout of transport networks. These provisions will assist in achieving positive</li> </ul>	<p>The provisions are efficient as they enable a degree of flexibility in regard to minimum lot areas which may be created within the Zone. The provisions enable smaller lots to be created (down to 500 m<sup>2</sup>). Policy 27.3.13.2 sets the direction for when these smaller lots can be provided for (where there is a demonstrated need for Industrial and Service activities on sites of that size and where it can be shown that the lots could viably provide for their long term functional needs). This provision recognises that smaller lots than anticipated may be required to meet demand from smaller Industrial and Service activities.</p> <p>The provisions seek to be effective in ensuring that no lots will be created in the Zone that are not capable of providing for the long term viability of Industrial and Service activities by making sites less than 500 m<sup>2</sup> non-complying activities, thereby specifying such lot sizes as not being anticipated within the Zone.</p> <p>The variation to Chapter 27 (Subdivision and Development) is considered effective in terms of facilitating the production of a District Plan that assists QLDC in carrying out its functions and in achieving the purpose of the Act as it ensures that the General Industrial Zone is appropriately identified within the new District Plan and that appropriate controls are set out in regard to subdivision activities within the Zone.</p>
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	<p>relationships between subdivided lots within the Zone and any transport networks which serve them, and contribute to the functional capacity of the Zone to meet the needs and expectations of landowners, business operators and employees, as well as visitors to the Zone.</p> <ul style="list-style-type: none"> <li>• The framework sets out an expectation that subdivision within the Zone will only take place where the necessary infrastructure exists to service the anticipated land uses or development that could occur on the subdivided sites. This provision will contribute to positive environmental outcomes as it will ensure sites are integrated with existing services such that they meet the needs of future lot owners and do not compromise Council's existing asset services with the immediate area.</li> <li>• The framework sets out expectations for subdivision within the areas contained within the Ballantyne Road Structure Plan and the Connell Terrace Structure Plan. This will assist in facilitating positive environmental outcomes relate to roading layout provision and location of walkways and the green network and building restriction areas.</li> </ul>	
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Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):	
<b>Option 1:</b> Retain the operative provisions	<ul style="list-style-type: none"> <li>• Would not address the identified issues with the operative provisions.</li> <li>• This option would continue to enable the subdivision of lots in parts of Zone down to 200m<sup>2</sup>. Lots of this size are unlikely to meet the needs of Industrial and Service activities which often required space for larger buildings, outdoor storage and for the movement of heavy vehicles.</li> </ul>
<b>Option 2:</b> Require larger minimum lot sizes within the Zone, such as 3000 – 5000 m <sup>2</sup> .	<ul style="list-style-type: none"> <li>• This option does not properly recognise the nature and characteristics of the District's industrial economy. In particular, it is less likely that Industrial and Service activities which requires sites for this size will seek locations within the District due to the competitive disadvantages they are presented with, such as the distance of the Zones from other urban areas and major ports, as well as the price of land.</li> <li>• This option may restrict the ability for many of the smaller activities that comprise the majority of the District's industrial economy from finding appropriate and affordable sites within the Zone, thereby causing them to locate elsewhere within the District or within other Districts.</li> </ul>
<b>Option 3:</b> Have a single minimum lot size within the Zone of 1000m <sup>2</sup> .	<ul style="list-style-type: none"> <li>• While this option may present a more simple rule framework and provide more certainty around the size of lots that might be created within the Zone, it does not enable the degree of flexibility necessary to meet the needs of the District's industrial economy which is characterised neither by heavy nor light industrial activities.</li> <li>• This option would not provide landowners/developers with the capacity to create smaller lots where they can demonstrate the need for Industrial and Service activities on sites of that size.</li> <li>• The option would limit the ability for many of the smaller activities that largely comprise the District's industrial economy from finding appropriate and affordable sites within the Zone, thereby causing them to locate elsewhere within the District or within other Districts.</li> </ul>

Issue 6 - Parking, manoeuvring and loading

**Note – The following policies are variations to Chapter 29 (Transport)**

**Objective 29.2.4** – An integrated approach to managing subdivision, land use and the transport network in a manner that:

- a. supports improvements to active and public transport networks;
- b. promotes an increase in the use of active and public transport networks and shared transport;
- c. reduces traffic generation; and
- d. manages the effects of the transport network on adjoining land uses and the effects of adjoining land-uses on the transport network.

**Note – This review does not propose any variations to Objective 29.2.4.**

A summary of proposed provisions and components of the Transport Chapter (Chapter 29) that address this issue and give effect to the objective (additions are underlined):

**Policies**

- 29.2.4.9 Ensure the location, design, and layout of access, manoeuvring, car parking spaces and loading spaces of Industrial activities, Service activities and vehicle-orientated commercial activities, such as service stations and rural selling places, avoids or mitigates adverse effects on the safety and efficiency of the adjoining road(s) and provides for the safe movement of pedestrians within and beyond the site, taking into account:
- a. The relative proximity of other accesses or road intersections and the potential for cumulative adverse effects; and
  - b. The ability to mitigate any potential adverse effect of the access on the safe and efficient functioning of the transport network.

Matters addressed in Table 29.3 – Standards for activities outside of roads (Chapter 29 Transport):

- 29.5.10 – Identifies off street loading space as needing to be provided on every site within the General Industrial Zone

Matters addresses in Table 29.4 – Minimum parking requirements



- 29.8.19 – note relating to parking spaces for ancillary Office, Retail and Commercial activities

<b>Costs</b>	<b>Benefits</b>	<b>Effectiveness and efficiency</b>
<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Landowners and/or businesses may incur costs associated with the provision of off street loading space as they will not be able to use this space for the purpose of operating and/or expanding their business operations. They may also incur costs in demonstrating that this space meets the requirements set out within Chapter 29 (Transport).</li> </ul>	<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• The proposed variation would produce positive environmental outcomes for the transport network in the Zone as it would ensure that space within the road corridor is not being used for the purpose of loading or unloading goods or materials used in association with or produced by Industrial and Service activities. Excluding loading and unloading from the road corridor will assist in providing for the safe and efficient operation of the roading network.</li> <li>• The proposed variation will also assist in providing for the safe and efficient use of sites within the Zone for the purpose of Industrial and Service activities thereby providing for healthy and safe work spaces for business owners and employees.</li> <li>• The note relating to parking spaces for ancillary activities will assist plan users and administrators in applying the correct parking provisions for the entirety of activities that are enabled on sites, assisting in providing positive</li> </ul>	<p>The proposed variation is considered to be the most appropriate and effective and efficient way to achieve Objective 29.2.4. In particular, the variation identifies Industrial and Service activities as types of land uses that can affect the transport network. It then specifies that transport related effects associated with the location, design, and layout of access, manoeuvring, car parking spaces and loading spaces of Industrial and Service activities need to be considered in terms of safety and efficiency of roads and movement of pedestrians both within and beyond sites.</p> <p>The existing provisions of Chapter 29 (Transport) are effective and efficient in fulfilling the direction provided by the variation to Policy 29.2.4.9. In particular, requirements are set out within Table 29.3 (Standards for activities outside roads) in relation to minimum parking requirements, location and availability of parking spaces (Table 29.4), size of parking spaces and layout, gradient of parking spaces and parking areas, mobility parking, reverse manoeuvring of heavy vehicles and queuing. Other standards in Table 29.3 set out expectations in terms of the design and formation of vehicle crossings, site distances etc.</p> <p>The variation to standard 29.5.10 compliments the existing set of transport related standards described</p>

	<p>environmental outcomes in terms of parking provision and safe and efficient use of the road network.</p> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>The proposed variation will enable the efficient use of sites for the purpose of Industrial and Service activities by ensuring that loading and unloading processes occur without necessary delay or difficulty. Efficiency improvements of this kind may lead to the operation of more economically viable and profitable activities within the Zone.</li> </ul>	<p>above that would relate to Industrial and Service activities within the Zone and would effectively and efficiently contribute to achieving the objective by providing a mechanism to manage the effects that loading and unloading requirements of Industrial and Service activities of on the roading network.</p> <p>The variation also ensures that the General Industrial Zone is appropriately identified within the new District Plan in order to assist QLDC in carrying out its functions and in achieving the purpose of the Act.</p>
<b>Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):</b>		
<b>Option 1:</b> Do not vary provisions within Chapter 29 (Transport)	<ul style="list-style-type: none"> <li>This option would not enable the Council to manage the possible effects that Industrial and Service activities have on the transport network. In particular, it would mean that off street loading space would not be provided for sites within the Zone. This may increase the number of activities needing to use the road corridor in order to undertake their loading and unloading operations.</li> <li>This would produce adverse effects on the roading network in locations where on-street space for the purpose of temporary loading and unloading is limited.</li> </ul>	
<b>Option 2:</b> Provide for on-street loading within the Zone by managing the potential effects of the activity through a controlled or restricted discretionary resource consent process	<ul style="list-style-type: none"> <li>This option would involve requiring a resource consent for every activity within the Zone for on-street loading and unloading. This is not appropriate as it would externalise effects of loading and unloading to the road corridor.</li> <li>It would require many Industrial and Service activities to apply for resource consents and incur the processing fee and time costs associated with these resource consents.</li> </ul>	

	<ul style="list-style-type: none"> <li>• There may be many instances in which it is not appropriate to grant a resource consent for loading and unloading activities to occur within the road corridor. This may severely restrict the capacity of sites to be viably used for the operation of Industrial and Service activities.</li> </ul>
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### **Part 1:**

Issue 7 - Amenity within and outside of the Industrial Zones

Issue 8 - Split zonings, inappropriate zoning layout and re-zonings

**Objective 18A.2.3** – Activities and development within the Zone provide a level of amenity which make it a pleasant, healthy and safe place to work in and visit.

A summary of proposed provisions and components of the General Industrial Zone that address this issue and give effect to the objective:

#### **Policies**

18A.2.3.1 Manage activities and development, both within sites and at their interface with public spaces, to ensure that people working in and visiting the Zone enjoy a pleasant level of amenity while recognising that the type of amenity experienced within the Zone may be lower than that anticipated within zones intended to accommodate more sensitive land uses.

18A.2.3.2 Control the location of ancillary Office, Retail and Commercial activities and encourage them to actively engage with the street frontage and public places.

18A.2.3.3 Control the bulk, location, design, landscaping, screening and overall appearance of sites and buildings, incorporating where relevant, the seven principles of Crime Prevention through Environmental Design (CPTED) to ensure they contribute to a quality, healthy and safe built environment while meeting the functional needs of Industrial and Service activities.

18A.2.3.4 Control activities and development by applying sound insulation ventilation standards or other appropriate mitigation to ensure they are not significantly adversely affected by Industrial and Service activities or by airport noise.

Matters addressed in in the Activities Table:

- 18A.4.3 – provides for the commercial sale of food and beverages as a permitted activity
- 18A.4.5 – identifies buildings as restricted discretionary activities – includes matters of discretion in regard to appearance, landscaping, signage, lighting, location/provision of waste and recycling storage and CPTED principles

- 18A.4.6 – specifies that alterations and additions within the Queenstown Airport Outer Control Boundary or the Queenstown Airport Air Noise Boundary shall meet the necessary standards of Chapter 36 (Noise)
- 18A.4.7 – identifies Outdoor Storage and Outdoor Waste Storage within building restriction areas as non-complying activities
- 18A.4.10 – identifies any activity requiring an offensive trade licence (excluding the collection/storage of used bottles and refuse collection/disposal) as a non-complying activity
- 18A.4.11 – identifies any activity which is not identified as a non-complying activity
- 18A.4.13 – identifies Activities Sensitive to Aircraft Noise within the Queenstown Airport Outer Control Boundary or the Queenstown Airport Air Noise Boundary as prohibited activities.
- 18A.4.17 – identifies Airports as prohibited activities
- 18A.4.18 – identifies Mining as a prohibited activity

Matters addressed in the Standards Table:

- 18A.5.2 – standards for the Commercial sale of food and beverages
- 18A.5.3 – minimum boundary setbacks
- 18A.5.4 – maximum building coverage
- 18A.5.5 – maximum building height
- 18A.5.7 – lighting and glare standards
- 18A.5.8 – outdoor storage standards
- 18A.5.9 – fencing standards

A summary of proposed provisions and components of the Noise chapter (Chapter 36) that address this issue and give effect to the objective:

Matters addressed in Table 36.7 – Ventilation requirements for other Zones (Table 5)

- Table 5 – identifies critical listening environments located within the General Industrial Zone as needing to meet the standards of Table 5.

<b>Costs</b>	<b>Benefits</b>	<b>Effectiveness and efficiency</b>
<b>Economic</b> <ul style="list-style-type: none"> <li>• The proposed framework sets out that activities and development within the Zone are expected to provide an appropriate level of amenity for people who work within and</li> </ul>	<b>Environmental</b> <ul style="list-style-type: none"> <li>• While acknowledging that the Zone is intended to accommodate specific types of activities that are known to have the potential to create noise, odour, heavy</li> </ul>	The proposed framework is considered to be the most appropriate and effective and efficient way to achieve Objective 18.2.3. In particular, the proposed provisions seek to manage the characteristics of activities and development which have the capacity to contribute to

<p>visit the Zone. Landowners and/or business owners may incur costs in achieving this level of amenity on sites which might otherwise have been invested in developing their business. In particular, additional costs could be incurred in instances where critical listening environments are proposed on sites within the Zone and the requirements of Table 5 of Chapter 36 (Noise) will need to be met. In addition, costs will be incurred where alterations or additions are proposed to Activities Sensitive to Aircraft Noise within the Queenstown Airport Outer Control Boundary or the Queenstown Airport Air Noise Boundary.</p> <ul style="list-style-type: none"> <li>• In some cases, resource consents will be required where Landowners and/or business owners propose land uses or developments that are not able to achieve the type of amenity anticipated within the Zone by the proposed provision framework. These resource consent processes will impose costs and additional time pressures on developments.</li> <li>• Some landowners and/or business owners may choose not to locate within the Zone on account of the proposed provision framework. This may result in the loss of Industrial or Service activities from the District or cause the activity to seek a location within the District which is not</li> </ul>	<p>traffic movements and other effects, and accommodate larger sites and buildings, the proposed provision framework sets out that the Zone is also an urban environment in which businesses locate and which attract people for the purpose of employment and trade. Therefore, it is reasonable to expect a Zone of this kind to provide an environment which achieves a reasonable balance between quality and functional usability. In achieving this balance, the Zone will drive land use and development that creates positive environmental outcomes in the form of buildings that are of an appropriate scale, appearance and location, and sites which when viewed from other locations within the Zone do not appear unsightly, and have positive relationships with other sites and public spaces.</p> <ul style="list-style-type: none"> <li>• The proposed variation to Chapter 36 (Noise) requiring that Critical listening environments within the Zone meet the standards set out in Table 5 of Chapter 36 will provide positive environmental outcomes for people who work within and visit the Zone as their activities will not be compromised by noise that could be emitted from Industrial and Service activities which adjoin the site or are located within the surrounding area.</li> </ul>	<p>the type of amenity that is experienced by people who work within and visit the Zone. These characteristics include the purpose, nature, scale and overall appearance of built form and sites.</p> <p>The provisions are effective as they recognise that amenity within the Zone requires an assessment of the way sites are used and developed (i.e. internal site considerations) as well as a consideration of the way sites interact with other sites and the street (i.e. external site considerations). By considering both internal and external site considerations, the provisions will promote more holistic assessments of amenity within the Zone.</p> <p>The provisions are considered efficient as they seek to strike a balance between achieving pleasant, healthy and safe amenity settings and ensuring the Zone provides for the functional needs of activities and development within the Zone. It would not be appropriate for the provisions to prioritise amenity characteristics over and above the capacity of the Zone to provide for the long term operation and viability of Industrial and Service activities.</p> <p>The variation to Chapter 36 (noise) is considered effective in terms of facilitating the production of a District Plan that assists QLDC in carrying out its functions and in achieving the purpose of the Act as it ensures that the General Industrial Zone is appropriately identified within the new District Plan and that appropriate controls are set out in regard to</p>
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<p>suitable for the activity or is more sensitive to this type of activity.</p> <p><b>Social and environmental</b></p> <ul style="list-style-type: none"> <li>The proposed provision framework does not prioritise amenity experiences for people working within and visiting the Zone. Instead it seeks to balance amenity with the functional needs of Industrial and Service activities. In balancing these needs, it is not likely that high quality amenity outcomes will be achieved in regard to social and environmental wellbeing.</li> </ul>	<ul style="list-style-type: none"> <li>The requirement to meet the standards of Chapter 36 (Noise) when alterations of additions are proposed in buildings that Activities sensitive to aircraft noise within the Queenstown Airport Outer Control Boundary or the Queenstown Airport Air Noise Boundary will ensure owners or occupiers of these buildings are not adversely effected by aircraft noise.</li> </ul> <p><b>Social</b></p> <ul style="list-style-type: none"> <li>The provision framework sets out that the Zone is a key location of human activity and interaction. These interactions are driven by people working in and visiting the Zone. These people should have pleasant, healthy and safe experiences within the Zone. By managing the nature, scale and function of activities and development it is considered that the provision framework will achieve positive social outcomes for those who work within and visit the Zone.</li> <li>The proposed provisions seek to provide a managed degree of diversity of activities within the Zone which are not only capable of supporting the long term viability of Industrial and Service activities but also serve the needs of people who work within and visit the Zone. This is provided for by the provision</li> </ul>	<p>noise produced by activities and development within the Zone.</p>
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	<p>of ancillary Office, Retail and Commercial activities and the commercial sale of food and beverages. These activities will positively benefit the daily needs of people, particularly those who work within the Zone.</p> <p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• The proposed framework may result in positive economic outcomes for landowners and businesses within the Zone. These benefits could materialise as a result of the Zone affording people with enjoyable and positive experiences. These experiences will promote the Zone as a good location to work and visit.</li> <li>• While the proposed framework identifies amenity within the Zone as an important consideration, it does not suggest that it is the single most important consideration. In particular, it seeks to balance amenity with the functional needs of Industrial and Service activities. In this way, the provisions seek to ensure that positive economic outcomes are afforded to land owners and business operators within the Zone.</li> <li>• The proposed variation to Chapter 36 (Noise) requiring that Critical listening environments within the Zone meet the standards set out in Table 5 of Chapter 36</li> </ul>	
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	will provide positive economic outcomes in terms of the intended function of the Zone to provide for the establishment, operation and long term viability of Industrial and Service activities as it will ensure they are not undermined or constrained by reverse sensitivity effects which might arise from the presence of critical listening environments.	
<b>Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):</b>		
<b>Option 1:</b> Retain the operative provisions	<ul style="list-style-type: none"> <li>• Would not address the identified issues with the operative provisions.</li> <li>• Would lead to inconsistency on drafting style in the PDP, and rather would result in a continuation of the complex drafting style of the ODP.</li> <li>• Would not provide the opportunity to introduce a policy framework and standards which have a greater capacity to provide for positive amenity related outcomes within the Zone.</li> </ul>	
<b>Option 2:</b> Do not attempt to control amenity within the Zone	<ul style="list-style-type: none"> <li>• While this option may provide for Industrial and Service activities to establish, operate and grow in a more flexible and intensive manner, it fails to recognise that the Zone is a key location of human activity and interaction. By not imposing standards to control amenity outcomes, the Zone would not attract people to work or visit the Zone, thereby compromising its function as a business zone designed to promote economic activity.</li> <li>• Low quality built form would develop within the Zone in terms of the visual appearance of buildings and spaces.</li> <li>• The location, accessibility and appearance of ancillary Office, Retail and Commercial activities enabled within the Zone would not integrate well with the underling purpose of the Zone in providing for Industrial and Service activities. In particular, customers would be expected to interact with the movement of vehicles on sites and possibly hazardous tools or equipment being used.</li> </ul>	



	<ul style="list-style-type: none"> <li>Sites within the Zone may attract anti-social behaviour.</li> </ul>
<b>Option 3:</b> Impose more stringent amenity controls within the Zone.	<ul style="list-style-type: none"> <li>This option would involve prioritising the amenity related matters. While it may result in high quality amenity outcomes, it would compromise the ability for sites to fulfil their functional purpose to deliver long term viable opportunities for Industrial and Service activities.</li> <li>A zone with this level of amenity expectations would better serve the needs of non-industrial type activities such as Office, Retail and Commercial activities.</li> <li>The cost of sites within the Zone will increase, making them less viable for Industrial and Service activities which often require cheaper sites.</li> </ul>

## **Part 2:**

Issue 7 - Amenity within and outside of the Industrial Zones

Issue 8 - Split zonings, inappropriate zoning layout and re-zonings

**Objective 18A.2.4** – Activities and development within the Zone are undertaken in a way that does not adversely affect the amenity of other zones.

A summary of proposed provisions and components of the General Industrial Zone that address this issue and give effect to the objective:

### Policies

18A.2.4.1 Manage noise, glare, dust, odour, shading, visual and traffic effects of activities and development within the Zone to ensure the amenity of other zones is not adversely affected, including through the use of Building Restriction Areas.

18A.2.4.2 Manage adverse effects of activities on the visual amenity of main gateway routes into Queenstown, Wanaka and Arrowtown through the use of landscaping and by controlling the bulk and location of buildings and development.

Matters addressed in in the Activities Table:

- 18A.4.5 – identifies buildings as restricted discretionary activities – includes matters of discretion in regard to appearance, landscaping, signage and lighting
- 18A.4.7 – identifies Outdoor Storage and Outdoor Waste Storage within building restriction areas as non-complying activities

- 18A.4.10 – identifies any activity requiring an offensive trade licence (excluding the collection/storage of used bottles and refuse collection/disposal) as a non-complying activity
- 18A.4.11 – identifies any activity which is not identified as a non-complying activity
- 18A.4.17 – identifies Airports as prohibited activities
- 18A.4.18 – identifies Mining as a prohibited activity

Matters addressed in the Standards Table:

- 18A.5.3 – minimum boundary setbacks
- 18A.5.4 – maximum building coverage
- 18A.5.6 – maximum building height/recession plane for sites which adjoin a residential zone (including the Meadow Park Special Zone) and the Large Lot Residential Zone
- 18A.5.7 – lighting and glare standards
- 18A.5.8 – outdoor storage standards
- 18A.5.9 – fencing standards

A summary of proposed provisions and components of the Noise chapter (Chapter 36) that address these issues and give effect to the objective:

Matters addressed in 36.5 Rules – Standards, Table 3 – Specific Standards

- 36.5.15 – identifies noise standards relating to activities operating within the General Industrial Zone – noise received in adjoining zones from activities within the General Industrial Zone are required to meet the noise standards of the zone in which it is received

<b><i>Costs</i></b>	<b><i>Benefits</i></b>	<b><i>Effectiveness and efficiency</i></b>
<b>Economic</b> <ul style="list-style-type: none"> <li>• The proposed framework sets out that activities and development within the Zone are expected to occur in a way that does not adversely affect the amenity present in other zones. Landowners and/or business owners who own and/or operate on sites that adjoin or are located in close proximity to other zones may incur costs in fulfilling this obligation. In particular, it may mean</li> </ul>	<b>Environmental</b> <ul style="list-style-type: none"> <li>• The proposed provision framework will ensure that activities and development within the Zone do not adversely affect the amenity of other zones. This will provide positive environmental outcomes for persons who might own land, live or operate a business within any other zone which adjoins or is located in close proximity to the GIZ. In particular,</li> </ul>	<p>The proposed framework is considered to be the most appropriate and effective and efficient way to achieve Objective 18.2.4. In particular, the provisions seek to identify those specific types of effects that might be associated with activities anticipated within the Zone (being noise, glare, dust, odour, shading and visual effects) and states that they need to be managed in a way that does not does not adversely affect the amenity of other Zones. The standards table sets out thresholds relating to each of these effects such that</p>

<p>that part of a site cannot be used in a way which best suits the functional needs of the way the activity operates and/or it may require them to invest in particular methods which manage the nature and scale of effects that might be associated with the activity.</p> <ul style="list-style-type: none"> <li>• In some cases, resource consents will be required where landowners and/or business owners propose activities or development which is unable to meet the test of not adversely affecting the amenity of other zones. These resource consent processes will impose costs and additional time pressures on developments.</li> <li>• Some landowners and/or business owners may choose not to locate within the Zone on account of the proposed framework. This may result in the loss of Industrial or Service activities from the District or cause the activity to seek a location within the District which is not suitable for the activity or is more sensitive to this type of activity.</li> <li>• A number of areas included within the General Industrial Zone are located in close proximity to other zones where a higher level of amenity is anticipated (i.e. zones with a residential purpose or function). Sites located within these particular zones may</li> </ul>	<p>the provisions aim to provide these persons with an ongoing expectation that the level of amenity they currently enjoy will not be adversely effected by activities and development that may establish, operate or grow within the GIZ.</p> <ul style="list-style-type: none"> <li>• Areas within the GIZ are located adjacent to or in close proximity to main gateway routes into Queenstown, Wanaka and Arrowtown. These main gateway routes are important when viewed in the context of the District's economy in which tourism and high quality landscape and urban environments play an integral role. These routes offer a large number of tourists with their first and/or last impression of the District's main urban environments. It is therefore important that activities and development within the GIZ do not adversely affect these main gateway routes. The proposed provisions will provide positive outcomes in regard to the environmental quality of the District's main urban gateway routes.</li> </ul>	<p>they provide expectations in regard to effects that activities within the Zone should not exceed.</p> <p>The provisions identify gateway routes that have a type or level of visual amenity that should be taken into account in decision making if those thresholds set out in the standards are breached. In identifying these areas, the provisions ensure that assessments are efficient and effective in regard to effects that activities and development within the Zone might have on visual amenity present outside of the Zone.</p> <p>The proposed variation to Chapter 36 (Noise) is effective and efficient in that it only controls noise from activities and development operating within the Zone which is received in other Zones.</p> <p>This variation is also effective in terms of facilitating the production of a District Plan that assists QLDC in carrying out its functions and in achieving the purpose of the Act as it ensures that the General Industrial Zone is identified within the new District Plan and that appropriate controls are set out in regard to noise produced by activities and development within the Zone.</p>
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<p>find it more difficult to meet the expectation set out by this provision framework.</p> <ul style="list-style-type: none"> <li>The proposed framework may exclude some types of Industrial and Service activities from being able to establish, operate or grow within the Zone as they may produce adverse effects on the amenity of other zones. In this instance these activities may experience difficulty finding a suitable site within the District, thereby excluding the benefits this activity may offer the District's economy.</li> </ul>		
<p><b>Alternative options considered less appropriate to achieve the objectives and policies (s32(1) (b)(i)):</b></p>		
<p><b>Option 1:</b> Retain the operative provisions</p>	<ul style="list-style-type: none"> <li>Would not address the identified issues with the operative provisions.</li> <li>Would lead to inconsistency on drafting style in the PDP, and rather would result in a continuation of the complex drafting style of the ODP.</li> <li>Would not provide the opportunity to introduce a policy framework and standards which have a greater capacity to provide for positive amenity related outcomes within the Zone.</li> </ul>	
<p><b>Option 2:</b> Do not attempt to control effects of activities operating within the Zone on the amenity of sites outside the Zone</p>	<ul style="list-style-type: none"> <li>While this option may provide for Industrial and Service activities to establish, operate and grow in a more flexible and intensive manner, it does not recognise that their effects are not always confined to the boundaries of the Zone. By not imposing standards to manage amenity effects beyond the Zone, persons who own property, live or work in other zones may experience adverse environmental, social, cultural or economic effects.</li> </ul>	

	<ul style="list-style-type: none"> <li>• This option does not take into account that much of the land already located with an industrial zone is positioned adjacent or in close proximity to land zoned for the purpose of accommodating more sensitive land uses.</li> <li>• This option does not set up an appropriate framework for dealing with future plan changes that might seek additional land to be included within the General Industrial Zone. In particular, it is noted that much of the remaining developable flat land within the District is likely to be located in close proximity or be adjacent to land zoned for the purpose of accommodating more sensitive land uses.</li> </ul>
<b>Option 3:</b> Impose more stringent controls to ensure the amenity of other zones is maintained.	<ul style="list-style-type: none"> <li>• This option would impose unrealistic expectations on activities operating within the Zone. To maintain the amenity of other zones would require all effects, including minor effects, to be confined to the boundary of the Zone. Achieving this would be likely to severely limit the ability of the Zone to achieve its functional purpose.</li> <li>• It is likely that significant investment would be required by land owners and business operators within the Zone to maintain the level of amenity within other Zones. This level of investment may result in land owners and business operators not choosing to locate within the Zone or the District, resulting in a loss of economic activity from the District.</li> </ul>

## **11. EFFICIENCY AND EFFECTIVENESS OF THE PROVISIONS**

- 11.1. The proposed provisions strike an appropriate balance to achieve the integrated management of the effects of the use, development, or protection of land and associated natural and physical resources of the district. In doing so, the proposed provisions are more appropriate than the alternatives considered.

## **12. THE RISK OF NOT ACTING**

- 12.1. Section 32(c) of the RMA requires an assessment of the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions. It is not considered that there is uncertain or insufficient information about the subject matter of the provisions.
- 12.2. The issues identified and options taken forward are the most appropriate way to achieve the purpose of the RMA. If these changes were not made there is a risk the District Plan would fall short of fulfilling its functions.

## **Appendices**

## **Appendix 1 – Market Economics report on the Industrial Economy**



**Appendix 2: Business Development Capacity Assessment 2017,  
Queenstown Lakes District, 15 March 2018, Market Economics**

**Appendix 3: Landscape Memo, Glenda Drive Rural General Zoning,  
21 February 2019, Helen Mellsop Landscape Architect**