

**BEFORE THE INDEPENDENT HEARING PANEL APPOINTED BY THE  
QUEENSTOWN LAKES DISTRICT COUNCIL**

**UNDER** the Resource Management Act 1991 (RMA)  
**IN THE MATTER** of the Te Pūtahi Ladies Mile Plan Variation in accordance  
with section 80B and 80C, and Part 5 of Schedule 1 of the  
Resource Management Act 1991.

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**STATEMENT OF REBUTTAL EVIDENCE OF JEANNIE ELLEN GALAVAZI  
10 November 2023**

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## **Introduction**

- 1 My full name is Jeannie Ellen Galavazi. I am a Senior Parks and Reserves Planner at Queenstown Lakes District Council (**QLDC or Council**).
- 2 I prepared a statement of evidence on behalf of QLDC dated 28 September 2023 on the submissions and further submissions to the Te Pūtahi Ladies Mile Plan Variation (**TPLM Variation**). My evidence covered the TPLM Masterplan, and TPLM Variation provisions relating to open space, recreation and reserve land, as well as Council's plans for 516 Frankton – Ladies Mile Highway.
- 3 I have the qualifications and experience as set out at paragraphs 4 and 5 of my statement of evidence dated 29 September 2023.
- 4 I repeat the confirmation given in my evidence that I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and that my evidence has been prepared in compliance with that Code.

## **Scope of rebuttal evidence**

- 5 In preparing this rebuttal statement, I have read and considered the evidence filed on behalf of submitters as that evidence relates to my evidence. There was no expert conferencing for my field.
- 6 In this evidence I respond to the:
  - (a) Statement of Evidence of Bruce Weir on behalf of the Anna Hutchinson Family Trust (107) dated 20 October 2023;
  - (b) Statement of Evidence of Bruce Weir on behalf of the Glenpanel Development Limited (73) dated 20 October 2023;
  - (c) Statement of Evidence of Erin Stagg on behalf of the Sanderson Group and Queenstown Commercial (93) dated 20 October 2023; and
  - (d) Statement of Evidence of Kristen Stalker on behalf of Maryhill Limited (105) dated 20 October 2023.

## **Western Extension Area to TPLM Variation area**

- 7 In relation to western Extension Area sought to be included in the TPLM Variation area by the Anna Hutchinson Family Trust (**AHFT**), Mr Bruce

Weir at paragraph 74 of his evidence for the AHFT, states that the Extension Area Structure Plan includes a Local Park (being a minimum size of 3000 m<sup>2</sup> and capable of containing a 30m x 30m shape as per QLDC Parks and Open Spaces Strategy 2021).

- 8 I note that the land identified in the Western Extension Area as a Local Park is predominantly linear and steeply contoured. A Local Park should be predominantly flat. Provision of a 30 x 30m flat area is only one of the design considerations of a quality Local Park. I consider it is difficult to see where recreation infrastructure such as a picnic shelter, public toilet or playground would be accommodated.

### **Community Buildings**

- 9 At paragraphs 76 – 77 of his evidence for AHFT, Mr Weir acknowledges my evidence in chief, which stated that community buildings (such as memorial halls and sports club rooms) do not currently exist in the TPLM Variation Area. Mr Weir states that the AHFT site can augment the accommodation of some of these amenities due to:
- (a) The site being located in immediate proximity to a transit hub and the memorial gardens / cemetery; and
  - (b) The existing 'Community Purpose' zoning, which provides a reasonable degree of latitude in land use.
- 10 There is no degree of latitude in land use for the existing Community Purpose zone which Mr Weir refers to as memorial gardens/cemetery. That site is the Lower Shotover Cemetery. It was opened in 2018 and will be progressively developed in stages as an operational cemetery. It is the only cemetery in the Wakatipu Basin with any capacity – all other cemeteries in Queenstown, Frankton and Arrowtown are nearly full. The Lower Shotover Cemetery's capacity will be under pressure from the Queenstown, Frankton, Lake Hayes, and Arrowtown communities all being channelled into this one cemetery, in addition to the projected population growth for our area.
- 11 Mr Weir has also given evidence on behalf of Glenpanel Development Ltd. At paragraphs 33 – 34 of this brief of evidence, Mr Weir states that the Homestead Precinct Plan (proposed by the submitter) could also play an important part in accommodating community buildings and facilities.

- 12 I agree in part with Mr Weir that the Homestead Precinct Plan would provide amenity and *could* play a part in accommodating community buildings and facilities. However I consider that while the Homestead Precinct Plan remains in private ownership, there is no guarantee that existing or proposed buildings will be available to the public or provide affordable, accessible and fit for purpose community facilities.
- 13 Mr Weir's evidence on behalf of Glenpanel Development Ltd notes at paragraph 32 that the Homestead Precinct Plan could also provide for commercial activities and that there is already a resource consent in place for this. Community facilities (such as a community centre or library) that are located on vested reserves provide the public with assurance that these facilities will be accessible to the public, and that the management of the facilities are subject to processes that require public input, such as the QLDC Community Facility Funding Policy 2019. The Reserves Act 1977 also sets out the types of activities and uses that are appropriate on reserves, and exclusive use for buildings or land use by a particular group typically requires a notified public process.
- 14 I consider that given the large residential population proposed in the wider Te Pūtahi area, it is critical to retain the Community Park as proposed in the TPLM Structure Plan, and the ability to locate public community facilities on this land in future. I also consider there will be high future demand for community facilities in the area and both public and private facilities would be well utilised.

### **Location and Size of Community Parks**

- 15 Ms Stagg's evidence on behalf of Sanderson Group and Queenstown Commercial, states at paragraphs 71 – 76 that:
- (a) future communities of the TPLM Variation area would be better served by a network of smaller parks and playgrounds that offer open space and recreational opportunities in closer proximity to dwellings and that these can be provided incrementally as development occurs; and
  - (b) that larger parks in a development of the size proposed in the TPLM Variation are often underutilised and can present issues for a crime prevention through environment design (**CPTED**) perspective.

- 16 Mr Stalker's evidence on behalf of Maryhill Limited similarly states at paragraph 21 that he does not consider the Community Park in the TPLM Structure Plan is the most efficient use of this land and that the final location of parks should be decided at the time of subdivision.
- 17 I retain my view stated in my statement of evidence at paragraph 52, that while smaller reserves can provide amenity, unlike Community Parks, they are not large enough to adequately provide for most recreation activities, or the associated recreation infrastructure. Two Local Parks are also proposed in the TPLM Structure Plan that will be in walking distance to most residential areas to provide for informal recreation that Ms Stagg refers to. As stated in my statement of evidence at paragraph 47, I retain my view that open spaces need to be identified up front in the TPLM Structure Plan so that Council can strategically acquire appropriately sized reserves in appropriate locations. Council has received many requests from the existing Lake Hayes, Shotover Country and Bridesdale community for recreation and community facilities that can only be provided for on suitable large reserves. These cannot currently be provided for on existing reserve land due to land constraints as described in my statement of evidence at paragraphs 23 – 35.
- 18 With respect to CPTED issues, I consider that there is little evidence support this statement. Reserves across the District that are well designed and centrally located within residential areas, such as the Community Park identified in the TPLM Structure Plan, are extremely well used and are not subject to regular vandalism or crime.

### **Development Contributions**

- 19 Mr Stalker at paragraph 23 of his evidence for Maryhill Limited states that if Council is to collect development contributions (**DCs**) for reserve offsets and pass these on to landowners providing Community Parks, the timing and calculations for DCs need to be provided at the outset to inform financial considerations for proposed development.
- 20 Mr Stalker at paragraphs 24 – 25 also considers that Council should be responsible for undertaking enhancements to reserves (funded through development contributions), and that reserve contribution matters should be stated in the TPLM Provisions.

- 21 Council has the ability through the QLDC Development Contributions and Financial Contributions Policy 2021 (**DC Policy**) to acquire funds for new reserve land (Reserve Land Development Contributions) and/or new park assets or other park improvements to respond to growth (Reserve Improvement Development Contributions). The calculations for Reserve Land DC's are provided in the DC Policy. The reserve land contribution for each dwelling equivalent across the Wakatipu area has been assessed at 22.5m<sup>2</sup>. This consists of:
- (a) 17.5m<sup>2</sup> Local & Community Park (charged as a cash and/or land contribution)
  - (b) 5m<sup>2</sup> Premier Sportsground Park (charged as a cash contribution)
- 22 The DC Policy is regularly reviewed to ensure land contribution and the valuation remains relevant. Reserve Land in the Eastern Corridor (which the TPLM Variation area is located in) has been valued at \$657 per m<sup>2</sup> in 2021. This would be subject to change with future reviews of the DC Policy (which is subject to a separate statutory process under the Local Government Act 2002).
- 23 Land offered to the Council in lieu of cash development contributions for reserve land acquisition must be of a suitable standard, size and purpose to be accepted by the Council. This is at the discretion of the Council and must adhere to the QLDC Future Parks and Reserves Provision Plan 2021.
- 24 The Future Parks and Provision Plan also sets out what type of reserve improvements are expected on Local and Community Parks, and whether DC offsets would be available if provided by a developer. Reserve improvements and who is responsible for delivering are not determined during the planning process but are agreed at the resource consent stage.

- 25 I do not support Mr Stalker's submission that reserve contribution matters should be stated in the TPLM Provisions, as the Council needs to be able to review and adapt the DC policy to respond to the fast pace of development in the district and increase in land value. Details for how DC's will be collected and/or how payment would be made to the landowner(s) that have reserve land would likely be addressed in a developers agreement which is a common mechanism used for developers and Council to agree on DC matters.

**Jeannie Ellen Galavazi**

**10 November 2023**