

RMA Form 5

Submission on a publicly notified variation to a proposed plan

Clause 6 of First Schedule Resource Management Act 1991



**Otago Regional Council's Submission
to the Queenstown Lakes District Council
Proposed District Plan Te Pūtahi Ladies
Mile Plan Variation**

This is a submission on the Queenstown Lakes Districts Council's Te Pūtahi Ladies Mile Plan Variation.

Otago Regional Council could not gain an advantage in trade competition through this submission.

ORC represents a relevant aspect of the public interest and has an interest in the proposed plan greater than the interest that the general public has, as it is the regional authority for the Otago Region.

ORC's submission is that it **supports** the proposed variation and has identified matters of relevance in making this submission.

The Otago Regional Council wishes to be heard in support of this submission.

Signature of submitter (or person authorised to sign on behalf of submitter):

A handwritten signature in black ink, appearing to read "Anita Dawe".

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1.0 Reasons for Submission

Grow Well Whaiora Partnership

- 1.1. Otago Regional Council (ORC) is working with Queenstown Lakes District Council in its urban development focused 'Grow Well Whaiora' partnership¹. ORC has joint responsibilities with Queenstown Lakes District Council (QLDC) to deliver on the objectives and policies of the National Policy Statement for Urban Development (NPS-UD).
- 1.2. One of our roles as a 'Grow Well Whaiora' partner is to provide input on regional issues (including matters such as stormwater management, and public transport) to support QLDC responding to growth issues, and planning for positive urban growth, such as Te Pūtahi Ladies Mile.
- 1.3. Under the NPS-UD, ORC has a joint responsibility with QLDC to deliver a Future Development Strategy (FDS). This is a significant mechanism to address growth and affordable land/housing shortfalls in Queenstown and the wider Lakes district in a timely manner. This work has begun and will build on the Queenstown Lakes Spatial Plan, which ORC has contributed to.

Regional Planning Context

- 1.4. Our responsibilities under the Resource Management Act 1991 (RMA) and the Local Government Act 2002 includes environmental management and community wellbeing, which our submission seeks that the variation must ensure are provided for.
- 1.5. For ORC, natural hazards, public and regional transport, air quality and water quality and quantity, including stormwater management issues have been particular matters of relevance to this process.
- 1.6. Ladies Mile is in close proximity to three major water bodies, the Shotover and Kawarau Rivers, and Lake Hayes.
- 1.7. Of these three waterbodies, Lakes Hayes is particularly sensitive, as it has had changes in surrounding land uses leading to water quality issues including a build-up of nutrients. Lake Hayes now suffers from periodic algal blooms caused by the build-up of phosphorous in lakebed sediments.
- 1.8. Because of the sensitivity of Lake Hayes, it is important the change in land use along Te Pūtahi Ladies Mile ensures robust management of '3 waters' infrastructure to ensure any urban development does not risk further degradation of Lake Hayes. ORC especially notes Policy 24.2.4.2 of the proposed QL District Plan that states:

¹ QLDC and ORC are partners along with central government agencies in the Grow Well Whaiora partnership.

“Restrict the scale, intensity and location of subdivision, development and use of land in the Lake Hayes catchment, unless it can occur consistently with improvement to water quality within the catchment “.

- 1.9. ORC supports Policy 24.2.4.2 and considers that Te Pūtahi Ladies Mile can be developed in a way that is sympathetic to the objectives of Grow Well and the requirements of the NPS-UD, while adhering to Policy 24.2.4.2.
- 1.10. This is especially important to support the work that Otago Regional Council are delivering through its programme of works to support rehabilitation of the lake. This includes augmentation of water from the Arrow River into Mill Creek, works within Hayes Creek to support the function of the existing culvert and a potential new culvert in the future.
- 1.11. The planning framework must also ensure the developments along Te Pūtahi Ladies Mile are strategically connected and integrated for public transport, and support multi modal transport options such as walking and cycling.

Regional Statutory Framework

1.12. The following are relevant to the proposed plan variation:

- National Policy Statement for Freshwater Management 2020
- National Environmental Standards for Freshwater

1.13. In addition, ORC has two Regional Policy Statement documents - the partially operative and the proposed Regional Policy Statement - that contain a range of relevant objectives and policies to matters related to the proposed plan variation, in particular:

Partially Operative Regional Policy Statement 2019

- 1.13..1.1. **Objective 3.1** *The values (including intrinsic values) of ecosystems and natural resources are recognised and maintained, or enhanced where degraded*
- 1.13..1.2. Policy 3.1.1 Fresh water
- 1.13..1.3. Policy 3.1.6 Air Quality
- 1.13..1.4. Policy 3.1.8 Soil Erosion
- 1.13..1.5. **Objective 4.1** *Communities in Otago are resilient, safe and healthy*
- 1.13..1.6. Policies 4.1 – 4.10 Natural Hazard policy suite
- 1.13..1.7. **Objective 4.4** *Energy resources and supplies are secure, reliable and sustainable*

- 1.13..1.8. **Policy 4.4.6** Energy efficient transport
- 1.13..1.9. **Objective 4.5** *Urban growth and development is well designed, occurs in a strategic and coordinate way, and integrates effectively with adjoining urban and rural environments*
- 1.13..1.10. Policy 4.5.1 Providing for urban growth and development
- 1.13..1.11. Policy 4.5.2 Integrating infrastructure with land use
- 1.13..1.12. Policy 4.5.3 Urban design
- 1.13..1.13. Policy 4.5.4 Low impact design

Proposed Regional Policy Statement 2021

- 1.13..1.14. **Objective AIR–O1** – *Ambient air quality*
- 1.13..1.15. **Objective AIR–O2** – *Discharges to air*
- 1.13..1.16. Policy AIR–P1 Maintain good ambient air quality

- 1.13..1.17. **Objective LF–WAI–O1** – *Te Mana o te Wai*
- 1.13..1.18. Policy LF–WAI–P4 – Giving effect to Te Mana o te Wai

- 1.13..1.19. **Objective UFD–O1** – *Form and function of urban areas*
- 1.13..1.20. **Objective UFD–O2** – *Development of urban areas*
- 1.13..1.21. **Objective UFD–O5** – *Urban development and climate change*
- 1.13..1.22. Policy UFD–P4 – Urban expansion

- 1.13..1.23. **Objective EIT–EN–O3** – *Energy use*
- 1.13..1.24. Policy EIT–EN–P9 – Energy conservation and efficiency

1.14. ORC considers, based on the information that has been provided, the proposed variation can be developed in a manner that is consistent with the above provisions from the relevant RPS.

2.0 Summary

2.1 ORC recognises the pressure on housing that the QLDC have been facing over a number of years. We consider this proposed plan variation is an important part of addressing that challenge.

2.2 Under the responsibilities of the various national level directions and regulations, ORC supports the proposed plan variation, in a manner that ensures any adverse effects on natural resources, natural hazards, energy demand and use, and public transport are appropriately addressed.

2.3 ORC as a Grow Well Whaiora partner will continue to support QLDC's development of the proposed District Plan Te Pūtahi Ladies Mile variation to ensure the relevant national directions and RPSs' framework are appropriately addressed.

End.