

FURTHER SUBMITTER 1360 - Rebecca Wolt and Andrew Hyland

SPEAKING NOTES

INTRODUCTION

1. We made a further submission on the UIV that opposed a number of submissions seeking intensification or rezonings in Arthurs Point and supported a submission that sought certain areas be excluded from the ambit of the UIV, including Arthurs Point. This oral presentation supplements the points made in our written further submission.
2. We are long time Arthurs Point residents and generally oppose the UIV as it relates to Arthurs Point, the LDSRZ in particular.
3. We have read the oral submission made by the Arthurs Point Community Association (presentation by APCA Chairperson, Andrew Blackford), and support and adopt the APCA position.

ARTHURS POINT

4. Arthurs Point is contained within a UGB. That being so, it has a unique semi-rural feel and character, and lacks the infrastructure and appearance attributable to many other urban areas.
5. Arthurs Point is encompassed by ONLs and ONF – the urban area is itself nested within an ONL. The developed areas – primarily residential, are located atop a terrace that contains the development and separates it from the ONF Shotover River and the river margins. The residential areas have been developed with low impact infrastructure- stormwater swales, low level (bollard) street lighting (if any), no comprehensive footpath network, no traffic lights. Streets are treated as common areas where residents casually congregate and children play.
6. Arthurs Point has for the most part been developed under the Operative District Plan. Under the ODP, the minimum lot size was 800m². The recent, more intensive residential development in the north of Arthurs Point has been undertaken pursuant to the HASHA legislation.
7. Recently, a small dairy-type store has established at the northern end of Arthurs Point, but there is otherwise is no convenience shopping on offer. Residents must visit Queenstown or Frankton for the shopping requirements.

8. Similarly, there are no Council or community facilities, no libraries, halls, schools or medical centres.
9. There are no real employment opportunities at Arthurs Point; residents must travel beyond Arthurs Point to Queenstown, Frankton or elsewhere for employment (unless working from home).
10. There is a cycle trail from Queenstown to Arthurs Point, however, this terminates south of Arthurs Point before the residential area and is hilly and unlit. For the remainder of the journey, cyclists must navigate a narrow, windy, busy road aside the Shotover Canyon. This leg is unsafe for less experienced cyclists and unaccompanied children. The journey to Queenstown is around 8km. To Frankton, it is much longer. Active travel is an option for only the fittest of experienced, enthusiastic cyclists (especially in winter).
11. There is an hourly, but at times irregular and unreliable, bus service into town.
12. In essence, residents at Arthurs Point must rely on personal vehicles to undertake their daily activities, including accessing employment, schools, community services, health care, and supermarket and household shopping.
13. Vehicle (and cycle and pedestrian) access to and from Arthurs Point is via Edith Cavell Bridge. The bridge is an historic, single lane structure. Previous Council reporting has found that the bridge is at capacity. The bridge operates on a give way basis and frequently vehicles must queue before they can cross the bridge. Queues are long at peak times. There is no separate cycle or pedestrian lane on the bridge. Cyclists and pedestrians must take their life into their own hands and navigate the shared narrow carriage way with vehicles. While some funding has been allocated in the LTP for a new bridge, the status of that appears quite fluid (the location and design are unresolved) and there is no certainty that the bridge will be upgraded or that any new access over the Shotover River will be established in the short term.
14. There are other infrastructure constraints that apply at Arthurs Point. The Council's evidence in this process identifies that there is no additional wastewater capacity, and that existing capacity is insufficient to service consented development. Upgrades are required before additional development, including intensification, can be entertained.

UIV

15. The purpose or objective of the Variation is to implement NPS-UD Policy 5. This is a specific and narrow purpose.
16. NPS-UD Policy 5 requires QLDC, as Tier 2 authority, to ensure that, as it relates to urban environments, the District Plan enables '*heights and density of urban form commensurate with the greater of:*
 - a. *the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
 - b. *relative demand for housing and business use in that location.*'
17. There are two clear elements of Policy 5:
 - a. Accessibility; and
 - b. Relative demand.
18. The District Plan must enable heights and densities commensurate with (the greater of) an area's accessibility and relative demand.
19. '*Commensurate with*' is not defined in the NPS-UD. Its ordinary dictionary meaning is '*proportionate to*'.
20. In our view, in implementing Policy 5, it would be inappropriate to apply a 'one size fits all' approach to intensification (i.e., height and density increases). To do so would overlook the 'commensurate with' and 'relative' requirements. In our view, what Policy 5 requires is an assessment of a particular area/location's characteristics: how accessible it is and the relative demand for development in that area/location.
21. We note that enabling greater heights and density in all areas/locations is not mandatory under Policy 5. Areas that have good accessibility and/or high relative demand may be appropriate candidates for intensification, whereas areas that do not rank highly on one or both counts may not.

SECTION 32 REPORTING

22. The reporting that underpins the Variation, including the s32 evaluation, assesses the accessibility and relative demand of various locations within the District.
23. Arthurs Point ranks poorly on both counts.
24. More particularly, the s32 reporting states:

*“Accessibility at Arthurs Point is at the **very low end of the accessibility spectrum** [being the lowest of all areas assessed]. There are limited amenities available in this location or easily accessible via active modes and public transport. It is noted that the District Plan already provides for some higher density development in this location.”*

(Barker Accessibility and Demand Analysis – Method Statement - page 28)

25. We agree with this statement, which, with reference to the factors that I have outlined earlier, is entirely accurate, in our view.

26. The Council’s reporting assesses demand as follows:

“Policy 5(b) of the NPS-UD requires a consideration of the relative demand of a location to help inform appropriate building heights and density. Guidance prepared by MfE to support the implementation of the NPS-UD recommends using land values (relative to other areas across an urban environment) and a land value-to-capital value ratio as indicators of demand. In addition, a number of other factors identified by the MfE Guidance include:

- locations close to open space and recreation opportunities*
- areas within, or close to, centres*
- areas with good transport opportunities*
- areas close to key services including, schools, hospitals and supermarkets*
- areas close to a range of business activities*
- locations with good views, outlook and amenity, including areas with water views or green space outlooks.*

The first five matters identified above are captured by the methodology for undertaking the accessibility analysis [in the s32 reporting]. The final matter is subjective (as different people place different values on the particular outlooks and views).”

(Barker Accessibility and Demand Analysis – Method Statement - page 20)

27. The findings of the demand analysis undertaken for the Council as part of the s32 evaluation are set out later in the B& A Report. The report identifies that:

‘Demand Areas’ which perform well under the various demand measures identified are generally well aligned with those which have performed best

under the accessibility analysis.... Generally, there is alignment of the higher levels of accessibility and demand.’ (Ibid, page 28, at 7.2)

28. Furthermore:

“The Proposed District Plans zones including centres, medium and high residential density areas, generally align with the areas identified as being highly accessible and where there is shown to be a demand for housing.

The accessibility and demand analysis indicates that the spatial extent of areas where more intensive residential activities can occur could be expanded in accordance with the requirements of the NPSUD. In particular, higher levels of intensification in Queenstown around the edges of the town centre (including parts of the PC50 area), Frankton and around the edges of the Wānaka Town Centre are likely to be suitable...”

(Ibid, page 29, at 7.3)

29. The relationship between demand and accessibility is shown in the bivariate analysis (access/land value) undertaken as part of the s32 reporting and illustrated by Figure 17 of the B&A Report:

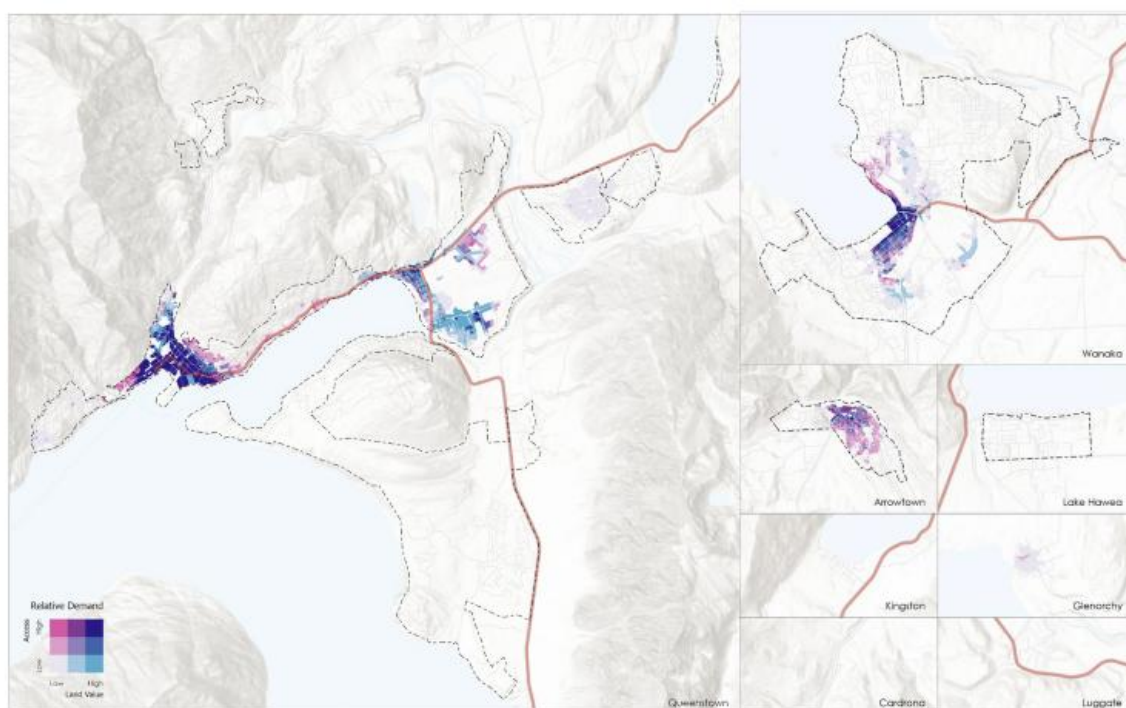


Figure 17 - Relative Demand Bivariate Analysis

30. Arthurs Point ranks the lowest on this analysis – with low relative demand.

WHY INCLUDE ARTHURS POINT IN THE UIV?

31. With very low accessibility and low relative demand, and noting again the purpose of the Variation is to implement Policy 5 – why is Arthus Point addressed by the Variation? The section 32 reporting just summarised does not warrant its inclusion. That is, inclusion of Arthus Point in the Variation – with its very poor accessibility and relatively low demand - is not necessary to implement NPS-UD Policy 5. Nor is it the most appropriate way to achieve the objective of the Variation.
32. The s32 reporting itself demonstrates that there are other areas that are not addressed by the Variation which performed much better – and/or which are much more logical and more appropriate candidates for intensification, for example, the Remarkables Park Zone (in the areas not affected by Aircraft noise), the PC50 site, and the HDRZ in Queenstown. These are ODP zones that the Council has indicated will at some point be assessed under NPS-UD Policy 5, but at this point in time, have not. The difficulty this presents for the Panel is that it does not have the full picture of the areas that are suitable/most appropriate for intensification and those that are not.
33. Enabling intensification – to any degree – at Arthurs Point is not only neither necessary nor appropriate to implement NPS-UD Policy 5; it would also fail to achieve NPS-UD Objective 1 and Policy 1.
34. NPS-UD Objective 1 and Policy 1 promote or require “*well functioning urban environments*” that (inter alia) have good accessibility for all people between housing, jobs and community services, and support reduction in green house gas emissions. The Council’s own reporting demonstrates that Arthurs Point has very poor accessibility. This factor necessitates reliance by residents on private vehicles to undertake their day-to-day activities. Providing for intensification at Arthurs Point will surely exacerbate this (as add to already dire traffic congestion on key transport routes), which will not support a reduction in greenhouse gas emissions (as required by NPS-UD Policy 1).
35. In summary, the objective of the Variation – to implement NPS-UD Policy 5 – should not be lost sight of when considering the appropriateness of the notified proposal to insofar as it applies to Arthurs Point. Simply put, the Council’s own reporting does not provide adequate justification, in section 32 or NPS-UD terms, for enabling intensification at Arthurs Point- on any level.

36. As a final point, it is also of some relevance to note that, while addressing different requirements of the NPS-UD, reporting by the Council in other processes has determined that there is sufficient dwelling capacity over the short medium and long term in Queenstown, including at Arthurs Point, even after taking account of feasibility constraints. This further begs the question: given its poor accessibility, low demand, coupled with its existing infrastructure constraints, why is this Variation being pursued for Arthurs Point? It is unnecessary and will likely result in disbenefits for the Arthurs Point and wider community.

R Wolt , for FS Submitters 1360