

**BEFORE THE HEARING COMMISSIONERS
AT CENTRAL OTAGO**

IN THE MATTER of the Resource Management Act 1991 ("the
Act")

AND

IN THE MATTER of the Proposed Plan Change 13 to the
Central Otago District Plan

**SECOND SUPPLEMENTARY STATEMENT OF EVIDENCE
BY LYNETTE PEARL WHARFE
FOR HORTICULTURE NEW ZEALAND
23 JULY 2019**

1. SUMMARY

- 1.1 I am Lynette Wharfe, Consultant Planner to HortNZ.
- 1.2 I have prepared a statement of evidence for this hearing (EIC), which sets out my qualifications and experience.
- 1.3 I have read the Environment Court's Code of Conduct for Expert Witnesses, and I agree to comply with it. My qualifications as an expert are set out in Appendix 1 of my EIC. I confirm that the issues addressed in this brief of evidence are within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2. SCOPE OF SUPPLEMENTARY EVIDENCE

- 2.1 This supplementary evidence responds to the Third Supplementary Statement of Evidence of Mr J Brown for River Terraces Development Ltd (RTDL) dated 15 July 2019, which sets out further s32 evaluation.
- 2.2 The Commission has sought responses from parties to the updated evaluation.
- 2.3 The updated evaluation includes:
 - (a) Option A: River Terrace Resource Area
 - (b) Option B: Greenfield residentially zoned locations
 - (c) Option C: Golf course and the Racecourse land
- 2.4 The evaluation is against the RTRA Objectives 20.3.1 – 20.3.11 as at 21 June 2019.
- 2.5 My comments do not consider the merits, or otherwise, of the proposed RTRA objectives.
- 2.6 My statement addresses two matters:
 - (a) Does the updated s32 evaluation include all relevant matters?
 - (b) Do original criticisms still stand?

3. DOES THE UPDATED S32 EVALUATION INCLUDE ALL RELEVANT MATTERS?

- 3.1 Previous versions of the s32 Evaluation have failed to adequately consider the effects of the development on orchards or the full impact of orcharding activities on those in the RTRA development.
- 3.2 While parts of the s32 Evaluation have been updated in my opinion there is still inadequate consideration of the effects on orchard or of orcharding activities on RTRA residents.

- 3.3 I include examples where I consider these matters need to be included as part of the s32 Evaluation.

Objective 20.3.2 Efficient, co-ordinated, integrated greenfields development

- 3.4 *Option A – Costs:* The evaluation does not identify costs to the neighbouring rural land uses from having greenfields intensive urban development located on their boundary.
- 3.5 *Option A – Risks:* The evaluation only includes noise generating activities as affecting residential amenity values. All potential adverse effects should be included, such as effects arising from orcharding activities.
- 3.6 *Option A – Efficiency:* It is not efficient to locate residential activities where amenity values could be adversely affected. The evaluation describes it as 'less' efficient. It is also not efficient to locate a distance from the Town Centre and this should be included in the evaluation.
- 3.7 *Option B – Benefits:* An additional benefit is that the SH would not be used as a key access for the developments, compared to Option A. There is also the benefit of being away from noisy activities.
- 3.8 *Option B – Risks:* The extent of the potential risk from the Ripponvale orchard should be better quantified.
- 3.9 *Option B – Efficiency:* While it may be inefficient to dismantle the Freeway orchard the benefit is that other orchards can continue unaffected by urban development. The effects on orchards are thereby ringfenced.
- 3.10 *Option C:* While there may be benefits from the golf course land being close to central Cromwell for walking and cycling the Spatial Framework does not remove all green space from the land currently occupied by the golf course.
- 3.11 Overall, I agree that Option B is the most appropriate to achieve Objective 20.3.2.

Objective 20.3.3 Well designed built environment

- 3.12 *Option A – Costs:* The cost of getting to the Town Centre should be included as a cost.
- 3.13 *Option A – Overall* should include consideration of other activities, not just noisy events.
- 3.14 *Overall:* Comparison of overall urban design is difficult to determine as Option A has a developed design while only assumptions can be made about Option B. I agree that overall Option B is the most appropriate to achieve Objective 20.3.3.

Objective 20.3.6 Road network

- 3.15 The evaluation concludes that Option A and B are equally appropriate to achieve Objective 20.3.6. In my opinion the clear disadvantage of Option A is the necessity to use the SH as access to the Town Centre. Therefore, while Option A may be well

integrated internally the external linkage pose considerable cost and risk and are inefficient.

Objective 20.3.10 Reverse sensitivity

- 3.16 *Option A – Costs* identifies costs to other parties in potentially needing to address complaints, but the evidence is that there are already procedures in place for this.
- 3.17 This statement fails to consider that the extent of potential complaint is significantly compounded by the scale of the proposed RTRA development which would increase the number of potential complainants far in excess of current neighbours.
- 3.18 I consider that this is a significant cost to other parties that is not recognised in that the procedures that are already in place are appropriate to the scale of current potential for complaint. The exponential increase will necessitate additional procedures and capacity by other parties to be able to address such complaints.
- 3.19 *Option A – Risks* identifies risks from nearby noise generating activities but does not include risks from other adverse effects that may arise from other activities. The focus only on noise effects does not reflect the full suite of potential adverse effects RTRA residents may encounter.
- 3.20 In addition, there is a risk that RTRA residents may try to circumvent the no-complaints covenant through other means, such as third parties.
- 3.21 *Option A – Efficiency* does not include the inefficiency of orchardists having to address complaints from RTRA residents.
- 3.22 *Option A – Effectiveness* considers that the method is effective as it has been used successfully in other circumstances but does not provide evidence that such other circumstances are at the scale envisaged by the RTRA.
- 3.23 *Option A – Overall:* The evaluation is focused only on noise and does not include other adverse effects that may arise.
- 3.24 *Option B – Benefits* identifies that the land is not located where noise from motorsport activities could lead to reverse sensitivity effects. There are additional benefits by not being located immediately adjacent to orchard activities that should also be identified. The evaluation identifies potential effects from frost fans from Ripponvale Orchard on the other side of SH6, but other adverse effects from orcharding would be mitigated through the highway separation and should be recognised. The proximity to the Ripponvale Orchard would be assessed at the time of planning approvals for the development.
- 3.25 I agree that Option B is the most appropriate for achieving Objective 20.3.10, especially when the additional benefits for orcharding are included in the evaluation.

4. DO ORIGINAL CRITICISMS STILL STAND?

- 4.1 Based on the above assessment my previous concerns regarding the s32 evaluation stand as there is a lack of recognition of the effect on orchards and orcharding activities on RTRA residents.

Lynette Wharfe

23 July 2019