



## Form 5

### Submission on Proposed Queenstown Lakes District Plan – Variation to Chapter 21: Landscape Schedules

#### Clause 6 of Schedule 1, Resource Management Act 1991

To: Queenstown Lakes District Council

Submitter: UCT Properties Ltd

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#### 1.0 Background:

1.1 Having established in Luggate in the early 1900s Upper Clutha Transport (UCT) have operated out of their depot on Main Road Luggate for over 100 years. UCT provide a wide range of services including haulage of freight and livestock, bulk cartage, earthmoving, hiab hire and fertilizer and lime spreading. In addition UCT supply aggregates, sand and landscape supplies and bulk fertilizer and have fuel stops at their Luggate and Wanaka depots.

1.2 UCT are in the process of transitioning out of their existing depot at 114 Main Road, Luggate to a new site on Church Road having secured a rezoning of the Church Road site to Rural Industrial Sub-Zone under Stage 3 of the Proposed District Plan. Earthworks, landscaping and construction of a large fertilizer shed has been completed under RM210465 and the

construction of a second building (comprising offices, storage, workshops and workers accommodation) and fuel stop has been approved under RM211096.

- 1.3 The new Church Road site (the site) has enabled UCT to relocate their established operations away from the residential parts of Luggate while retaining its close ties to the township.
- 1.4 The site is legally described as Lot 1 DP 300025 and Lot 1 DP 475297, held together on Record of Title 654501.
- 1.5 The Luggate Sawmill and the Alpine Group's venison and deer velvet processing factory lies immediately to the south west of the site and is also covered by the Rural Industrial Sub-Zone overlay (applied as part of Stage 1 of the Proposed District Plan).
- 1.6 The land to the north east of the site includes a number of industrial activities such as truss and framing fabricators and electrical contractors.
- 1.7 The site forms part of a Rural Character Landscape (as identified in Stage 1 of the Proposed District Plan) that extends to the north, south and west. The land to the east of the site is classified as an Outstanding Natural Landscape that encompasses the Clutha River and its margins. The site and the wider area extending to the west forms part of the Church Road – Shortcut Road RCL Landscape Priority Area (reference 21.23.4).

**2.0 UCT Properties Ltd's submission relates to the following provisions of the Queenstown Lakes District Council's Proposed District Plan:**

- 21.23.4 – Church Road – Shortcut Road RCL

**3.0 Without derogating from the generality of the above, UCT Properties Ltd's submission is that:**

UCT oppose the description of important land use patterns and features (paragraphs 8 to 13)

- 3.1 The Landscape Schedule of the Proposed District Plan acknowledges (at paragraph 12) the presence of '*A small area of industrial type landuse near the Grandview Bridge*'. However, it

is considered that the extent of industrial / rural industrial land use is greater than suggested in the landscape schedule. As mentioned above, there are several established industrial / rural industrial land uses within the Landscape Priority Area. These established land uses are generally located on the east side of Church Road and include the Alpine Group's venison and deer velvet factory, the Luggate Sawmill, the UCT site and the industrial activities to the north. Collectively those activities cover an area of approximately 15.3 hectares and stretch along Church Road for approximately 950m. The UCT site, the factory and the sawmill are all located on land that is zoned Rural Industrial Sub-Zone. The 15.3 hectares of land covered by established and or zoned industrial and rural industrial activities comprises approximately 10% of the Landscape Character Unit.

- 3.2 Most of the sites along the eastern side of Church Road are occupied by a number of large to medium sized buildings that are accompanied with the outdoor storage of materials and machinery. The approved consents for the UCT site include two large buildings, one 4,469m<sup>2</sup> and the other 4,630m<sup>2</sup>, as well as a fuel stop, truck wash and various other facilities associated with the transportation activity that will operate from the site in the future. Similar outcomes could occur on the Rural Industrial Sub Zoned land immediately to the south (being the land currently occupied by the sawmill and factory).
- 3.3 These uses and buildings would interrupt the expansive 'rural' views from Church Road albeit that Building Restriction Areas and specific Activity Areas have been identified on the UCT site in order that some views to the Grandview Range are maintained. While the Pisa and Grandview ranges are and would still be visible from Church Road, there would be a number of industrial buildings visible within that view.

UCT **oppose** the description of important shared and recognised attributes and values (paragraphs 24 to 26)

- 3.4 The identified important shared and recognised attributes and values do not include acknowledgement of the suitability of land to the east of Church Road for industrial / rural industrial activities, having been identified as such in the Luggate Community Plan and reflected in the Rural Industrial Sub Zoning applied through Stages 1 and 3 of the Proposed District Plan. In addition Upper Clutha Transport's strong ties to the Luggate community and

the important employment function that their rural industrial activities have provided for over 100 years has not be acknowledged.

UCT **oppose** the description of particularly important views to and from the area (paragraphs 31 to 33)

3.5 The description of important views to and from the area fails to acknowledge the established industrial and rural industrial land uses along the eastern side of Church Road, particularly in relation to views to the Grandview Range to the north east. Rather only reference is made to the rural and rural living uses in the area.

3.6 The industrial and rural industrial activities would also be seen in views from the river tracks as well as potentially the elevated portions of Luggate.

UCT **oppose in part** the description of naturalness attributes and values (paragraphs 34 and 35)

3.7 While paragraph 34 correctly identifies that the existence of rural industry will somewhat compromise perceptions of naturalness it fails to acknowledge that the established industrial and rural industrial activities form part of the character of the area alongside the working rural character.

UCT **oppose** the description of remoteness/wilderness attributes and values (paragraph 40)

3.8 Paragraph 40 of the Landscape Schedule describes remoteness/wilderness attributes and values and includes *“Impressions of rural tranquility and quietness which are localized to parts of Church Road away from rural living and rural industrial uses...”*.

3.9 Church Road extends for 1.4km from State Highway 6 at its south western end to Shortcut Road / State Highway 8A at its north eastern end. The established and zoned rural industrial and industrial activities extend along the east side of Church Road for 950m with rural living to the south west and on the western side of the road. It is therefore unclear where the areas of rural tranquility and quietness might be located given that almost the entire length of Church Road is bounded by industrial, rural industrial and/or rural living activities.

UCT **oppose** the description of aesthetic qualities and values (paragraphs 41 and 42)

- 3.10 The description of aesthetic qualities and values fails to acknowledge the established industrial and rural industrial activities and zoning along Church Road.

UCT **oppose** the summary of Landscape Values (paragraphs 43 to 45)

- 3.11 The summary of landscape values fails to acknowledge the established industrial and rural industrial activities and zoning along Church Road, particularly in relation to physical and perceptual values.

UCT **oppose** the schedule of Landscape Capacity

- 3.12 The schedule of landscape capacity does not include any capacity rating for rural industrial buildings and/or activities.

Conclusion

- 3.13 UCT submit that, as notified, the Schedule of Landscape Values does not adequately acknowledge or provide for the continuation and expansion of existing and approved industrial activities to the east of Church Road.

- 3.14 Overall UCT submit that the Schedule of Landscape Values of the Proposed District Plan:
- does not promote or give effect to Part 2 of the Act,
  - does not meet section 32 of the Act,
  - is contrary to the purposes and provisions of the Act and other relevant planning documents;
  - is inappropriate and inconsistent with the purpose and principles of the Act;
  - conflicts with and does not give effect to the higher order provisions of the Proposed District Plan; and
  - is not the most appropriate method for achieving the objectives of the Proposed District Plan having regard to its efficiency and effectiveness, and taking into account the costs and benefits.

**4.0 The submitter seeks the following decision from the Queenstown Lakes District Council:**

4.1 That the Rural Industrial Sub-Zoned land at Church Road is excluded from the Landscape Priority Area.

4.2 If the Rural Industrial Sub-Zoned land is not removed from the scheduled area, that the landscape schedule for Church Road – Shortcut Road RCL is rewritten to better reflect and provide for the existing and zoned rural industrial activities along the eastern side of Church Road. In particular the descriptions of important land use patterns and features, shared and recognised attributes and values, particularly important views, naturalness and remoteness values and attributes should be amended to better acknowledge rural industrial activities.

4.3 That the schedule of landscape capacity is amended to address rural industrial activities and rural industrial buildings (being two distinct activities) within the Rural Industrial Sub Zone and the wider Landscape Priority Area.

4.4 That, given the permitted activity status of substantial buildings and associated rural industrial activities within the Rural Industrial Sub-Zone, a high landscape capacity for those activities should be identified for the Rural Industrial Sub-Zoned land.

**5.0 The submitter could not gain an advantage in trade competition through this submission.**

**6.0 The submitter wishes to be heard in support of their submission.**

**7.0 If others make a similar submission the submitter would consider presenting a joint case at a hearing.**



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**Scott Edgar (on behalf of UCT Properties Limited)**

26 August 2022