

**BEFORE AN EXPERT CONSENTING PANEL APPOINTED BY
THE ENVIRONMENTAL PROTECTION AUTHORITY**

UNDER the COVID-19 Recovery (Fast-Track
Consenting) Act 2020 (**Fast Track Act**)

IN THE MATTER of an application by Wooring Tree
Development LP for 332 residential lots, 3
business super lots accommodating various
retail service activities, travellers'
accommodation, provision for a child care
centre and associated roads and parks

**LEGAL SUBMISSION FOR CENTRAL OTAGO DISTRICT
COUNCIL**

Dated 30 June 2021

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MAY IT PLEASE THE PANEL

1. INTRODUCTION

- 1.1 These submissions are made in support of the comments made, and evidence in support thereof, by the Central Otago District Council (“the Council”).
- 1.2 The Council is the territorial authority within whose district the site owned by Wooing Tree Partnership Development LP (**Wooing Tree Site**) is located.
- 1.3 At a high level, the Council’s position is:
 - (a) It seeks future development within the Cromwell urban area to be undertaken in a manner that is consistent with the Cromwell Eye to the Future Master Plan Spatial Framework (**Spatial Plan**).
 - (b) The Council has budgeted in its Long Term Plan for a range of projects to give effect to the Spatial Plan with almost one half of that expenditure to be dedicated to the Town Centre and associated Civic Facilities.
 - (c) The component of the Application comprising the Wooing Tree Commercial Centre (**WTCC**) encompassing the travellers’ accommodation and retail shops/tenancies is likely to jeopardise the Council’s investment by an creating an over-supply of commercial and business space as proposed in and by the WTCC.
 - (d) The scale, intensity and placement of the WTCC and activities therein will be in direct competition to Cromwell’s existing commercial areas and will have significant adverse effects on the Cromwell Town Centre and Heritage Precinct.

- 1.4 Without derogating from the above, there has been an inadequate assessment of the effects of the WTCC on the environment – namely the Cromwell Town Centre and Cromwell Heritage Precinct, such that the Panel should refuse consent to the WTTC component of the Application¹.

2. EVIDENCE TO BE PRESENTED

- 2.1 The following witnesses have provided evidence on behalf of the Council:

- (a) Mr Antoni Facey, traffic/transportation engineer. Mr Facey undertakes a review of the design of the subdivision and effects on the local road network;
- (b) Mr Tim Heath – provides a review of the economic assessment provided by Market Economics (ME) Limited in support of the resource consent application;
- (c) Mr Neil Penny – architect and urban planner. Mr Penny’s evidence examines the relationship of the resource consent application with the District Plan, the Spatial Plan and urban design factors;
- (d) Ms Marilyn Brown – urban planner and resource consultant. Ms Brown’s evidence reviews the application in the context of land use and connectivity considerations of the wider Cromwell environment related to the Spatial Plan and the existing zoning of the Wooing Tree Site.

¹ Under clause 31(8), schedule 6 of the Fast Track Act, a panel may decline a consent application on the ground that the information provided by the applicant is inadequate to determine the application.

3. LEGAL AND CONTEXTUAL ENVIRONMENT

Legal context

- 3.1 The matters that must be considered to determine the Application are set out in Clause 31, Schedule 6 of the Fast Track Act.
- 3.2 When considering the Application, the expert consenting panel must, subject to Part 2 of the RMA and the purpose of the Fast Tract Act, have regard to:
- (a) any actual and potential effects on the environment of allowing the activity;
 - (b) any measure proposed or agreed to by the Applicant to ensure positive effects on the environment to offset or compensate for any adverse effects that will or may result from allowing the activity;
 - (c) any relevant provisions in the following documents:
 - (i) a national environmental standard;
 - (ii) other regulations made under the RMA;
 - (iii) a national policy statement;
 - (iv) a New Zealand coastal policy statement;
 - (v) a regional policy statement or proposed regional policy statement;
 - (vi) a plan or proposed plan;

- (vii) a planning document recognised by a relevant iwi authority and lodged with a local authority; and
- (d) any other matter the panel considers relevant and reasonably necessary to determine the consent application.

3.3 Under Part 2 of the RMA:

- (a) The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while-
 - (i) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
 - (ii) safeguarding the life-supporting capacity of air, water, soil and ecosystems; and
 - (iii) avoiding, remedying, or mitigating any adverse effects of activities on the environment².
- (b) In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for matters of national importance³.

² RMA, section 5

³ RMA, section 6

(c) In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to other matters including the efficient use and development of natural and physical resources, the maintenance and enhancement of amenity values, and the finite characteristics of natural and physical resources⁴.

3.4 The purpose of the Fast Track Act is to urgently promote employment to support New Zealand's recovery from the economic and social impacts of COVID-19 and to support the certainty of ongoing investment across New Zealand, while continuing to promote the sustainable management of natural and physical resources⁵.

Contextual environment

3.5 A clear understanding of the contextual environment is important to properly assess the environmental effects of the Application and its consistency with the policy framework of the District Plan, and the outcomes sought in the Spatial Plan.

3.6 The application site is located in Cromwell north between State Highway 6 to the west, State Highway 8B to the south and Shortcut Road to the east. Residential development in this part of Cromwell is characteristic of a very low level of residential density.

Central Otago District Plan Change 12

3.7 In February 2019, Plan Change 12 to the District Plan was approved, granting the Wooing Tree site increased residential capacity as follows:

⁴ RMA, section 7

⁵ Fast Tract Act, section 4

- 19 ha to provide for a maximum of 210 dwellings of varying lot sizes from 350m² to 1000m²
- 2.8 ha small hospitality commercial/visitor experience
- visitor accommodation and neighbourhood childcare/neighbourhood community facility

3.8 Policy 8.2.8, introduced by PC 12 states:

“To provide for the development of a high quality travellers accommodation and associated village vineyard themed retail and commercial activities in a manner than complements other business activities in Cromwell.”

3.9 Plan Change 12 was approved by the Council on the basis it was appropriate for density of residential development greater than that provided for by the former residential activity area, and that the proposed scale, location and function of the commercial/business activities envisaged would not detract from the importance and function of the existing Town Centre and other community nodes and infrastructure of the Cromwell township⁶.

Cromwell Eye to the Future Master Plan Spatial Framework

3.10 In May 2018, the Council engaged consultants to prepare the Spatial Plan. The primary elements focus on four key planning and urban design factors:

- concentrating activity within clearly defined centre or activity nodes;

⁶ See discussion at paragraphs [10] – [13] Penny evidence

- erecting a place-based approach to accommodating growth and densification which focuses on these existing centres;
- outlining where key land uses should be located and supported within Cromwell;
- creating clear guidance for zoning changes for Cromwell.

3.11 The precinct's centres or activity nodes and key community facilities were acknowledged as Cromwell Town Centre, the historic node of the original town centre known as Old Cromwell, recreational and reserve locations and educational facilities. Notably, no centre or activity node is identified within the Wooing Tree Site⁷.

3.12 The Wooing Tree Site is located within the walkable catchment of the Cromwell Town centre, and was identified by the Spatial Plan as appropriate for the *potential* of increased residential density.

4. ASSESSMENT UNDER CLAUSE 31, SCHEDULE 6 OF THE FAST TRACK ACT

4.1 The assessment under clause 32 of schedule 6 of the Fast Tract Act requires an assessment of the actual and potential effects on the environment, consideration of the mitigation proposed, and an assessment against the relevant provisions of higher order planning documents.

4.2 It is my submissions that:

- (a) the Application does not promote the sustainable management of natural and physical resources under section 5 of the RMA.

⁷ Penny at paragraph [39]

- (b) for the reasons given, the actual and potential effects of the Application, particularly those associated with the WTCC, are significant and have not been adequately assessed, nor avoided, remedied or mitigated;
- (c) the measures proposed to ensure positive effects on the environment do not outweigh or justify the adverse effects of the Application;
- (d) for the reasons given, the Application is contrary to the objectives and policies of the District Plan, relevant higher order planning documents and the development objectives in the Spatial Plan.

5. THE APPLICATION DOES NOT PROMOTE THE SUSTAINABLE MANAGEMENT OF NATURAL AND PHYSICAL RESOURCES

The Panel must have regard to the considerations set out above, subject to Part 2 of the RMA and the purpose of the Fast Tract Act

- 5.1 A decision on an application heard under the Fast Track Act must be made considering both Part 2 of the RMA and the purpose of the Fast Tract Act.
- 5.2 Under the RMA this includes managing the use and development of land in a way that avoids, remedies and mitigates adverse effects on the environment and includes consideration of the maintenance and enhancement of amenity values.
- 5.3 In respect of the purpose and principles in Part 2 of the RMA, the following are of particular relevance to the Application:

- (a) promoting the sustainable management of natural and physical resources by enabling communities to provide for their social wellbeing and for their health and safety (section 5(1) and (2));
- (b) sustaining the potential of natural and physical resources to meet the reasonably foreseeable needs of current generations (section 5(2));
- (c) avoiding, remedying and mitigating any adverse effects of activities on the environment (section 5(2));
- (d) the efficient use and development of natural and physical resources (section 7(b));
- (e) the maintenance and enhancement of amenity values (section 7(c));
- (f) the maintenance and enhancement of the quality of the environment (section 7(f));

5.4 Overall, as discussed further below, it is submitted that the application fails to promote the sustainable management of natural and physical resources under section 5 of the RMA:

- (a) It does not provide for the social and economic wellbeing of the Cromwell community by adequately avoiding, remedying and mitigating the adverse economic, amenity, and landscape effects of the application.
- (b) It does not provide for the efficient use and development of the Town Centre and Arts and culture precinct as envisaged by the Spatial plan by introducing a competing commercial centre.

(c) The design and layout of the development does not maintain or enhance amenity values, or the quality of the environment expected in this part of Cromwell, and the wider Central Otago area.

5.5 In respect of the purpose and principles in the Fast Track Act, consideration must be given to employment opportunities and support for the certainty of ongoing investment while promoting the sustainable management of natural and physical resources.

5.6 The positive benefits associated with the application include:

- (a) increased residential density which would result in additional economic efficiencies and social benefits to the community, including additional housing supply;
- (b) capital injection and employment opportunities
- (c) WTCC becoming a commercially viable destination

5.7 However,

- (a) as discussed below, based on the evidence of Mr Facey, Mr Penny, and Ms Brown, the application, particularly as it relates to the WTCC, does not contribute to a well-functioning urban environment. The function and operational performance of the WTCC appears is flawed and in jeopardy as a result of its location proximate to the main access to the development, conflict with cyclists and pedestrians and shared spaces.
- (b) any positive benefits associated with the WTCC component of the application are likely to come at a cost to existing centres which are suffering from reduced tourist volumes as a result of the global pandemic.

- 5.8 The Fast Track Act does not amend the RMA itself, it only provides an alternative consenting pathway. It is therefore crucial that the expert consenting panel adequately consider the actual and potential effects of the application, and the relevant planning documents, in light of the RMA as well as the Fast Track Act.
- 5.9 The intention of the Fast Track Act is to unlock appropriate projects to provide short term economic benefits to assist with New Zealand's economic recovery from COVID-19. In comparison, the RMA is focused on the long-term impact of development and how a proposed development fits within the environment. While the Application was referred to the Panel, and the Minister was satisfied the project would be consistent with the Fast Track Act, it is submitted the Panel is not bound by the referral decision. It must independently determine if resource consent should be granted.
- 5.10 It is submitted that it is critical that in seeking to unlock short term economic benefits, such as employment, this does not result in bad long-term planning outcomes. This overriding imperative is also clear in the Fast Track Act, with its purpose also to promote the sustainable management of natural and physical resources.
- 5.11 In this regard, the economic evidence for the Council is that cumulatively the breadth and scale of those retail and commercial activities sought to be consented in the WTCC is likely to generate additional impacts on the Cromwell Town Centre and Cromwell Heritage Precinct above those generated had the Wooing Tree commercial centre remained in the original location identified in Plan Change 12⁸. Furthermore, ME's claimed benefit of tourism accommodation within the WTCC increasing the opportunity for

⁸ Heath at page 5

town centre business to attract tourist expenditure would endure with the tourist village in its original PC12 location.

- 5.12 Claimed economic benefits need to be evaluated by the Panel very carefully so as not to result in bad long-term planning outcomes. As discussed in the evidence for the Council, while the Application seeks to provide for additional commercially zoned land immediately opposite the Cromwell Town Centre, and across from State Highway 8B, this has the potential to compromise future intensification and revitalisation of the existing town centre.
- 5.13 It is submitted that the full economic effects and duration of the pandemic remain enigmatic. Short-term positive economic effects should not therefore be at the expense of bad long term planning outcomes. Cromwell is a small township and has limited need for additional retail and other facilities, nor any capacity constraints.

6. ACTUAL AND POTENTIAL EFFECTS OF THE APPLICATION ON THE ENVIRONMENT

- 6.1 The Council's expert evidence assesses the Application in terms of the residential development on the one hand and WTCC on the other. There are a range of adverse effects identified for each component.

Residential development

Landscape, amenity, urban design and visual effects

- 6.2 Development is set within the PC12 30m rural zoned buffer along State Highway 8B and 6. These setbacks restrictions serve a number of key urban design functions including visual and acoustic. Likewise they serve to preserve the visual quality of Cromwell's distinctively open rural character.⁹ The substantial reductions in setback and

⁹ Penny paragraph [20]

encroachment of built form closer to the state highways will adversely affect amenity values, particularly future residents external environments, and adversely affect visual amenity values with unsightly views into back yards and rear fences¹⁰.

- 6.3 Open space has been provided at a significantly reduced level to that contemplated by PC12 provisions. Inadequate open space is provided for a residential development of this size – only 4.2% of the overall area given to public open space, and has poor linkages to primary infrastructure¹¹.

WTCC

Landscape, amenity, urban design and visual effects

- 6.4 The majority of signage is proposed in the buffer area. The provision, scale and extent of signage (and likely lengthy duration) will significantly detract from the visual amenity qualities of the state highway entrances to Cromwell¹².
- 6.5 The proposed pedestrian underpass will not promote nor achieve safe and efficient connectivity between the Wooing Tree Site and the greater Cromwell town centre and urban area and is inconsistent with good urban design principles.
- 6.6 Visual and amenity effects are discussed in Mr Penny's evidence¹³. In summary he opines that the typology of buildings is in general inconsistent with the rural regional character of Cromwell and Central Otago with adverse amenity and visual effects, particularly at the interface of the state highway. Such built form is described as

¹⁰ Penny at paragraphs [27] – [29]

¹¹ Penny at paragraph [57.6]

¹² Penny at paragraph [36]

¹³ From paragraph [57]

intentionally stand-alone aligned to ‘highway retail and highway tourism’. These buildings are inappropriate to the Cromwell context.

- 6.7 The adverse visual and amenity effects of the proposed commercial development are significant given the buildings alignment close to the state highway (8B), the proposed typology, expanse of ‘tarmac’ car parking areas and the lack of adequate landscape treatment.

Traffic effects

- 6.8 The location of the commercial area creates conflict with pedestrians, cyclists and drivers. The commercial area is in the wrong location from a traffic design perspective and creates an unsafe and inefficient road network.¹⁴ Likewise the proposal for a shared space on the main road.¹⁵ The shared road cannot operate safely and is a fatal flaw in the proposal.
- 6.9 The failure to provide for minimum intersection spacing, for the first intersection off the round-about (Blondie Drive) will adversely affect the safety and efficiency of the round-about and intersection and is likewise a fatal flaw in the design.¹⁶
- 6.10 There are significant challenges in connecting the Wooing Tree Site with the greater Cromwell urban area, namely separation by green space and a major arterial road. The current internal design does not have a clear view to the underpass. Without it, use will not be encouraged and pedestrians will be more likely to walk to and across the round-about and avoid the underpass all together. This reinforces the need for the commercial area to be relocated to a more appropriate location.¹⁷

¹⁴ Facey paragraphs [15] – [18]

¹⁵ Facey paragraph [24]

¹⁶ Facey paragraph [37]

¹⁷ Facey paragraphs [48] and [56]

Effects on Cromwell Town Centre and Heritage precinct

- 6.11 These effects are discussed comprehensively in the evidence of Mr Heath, and Ms Brown. Mr Heath observes that the WTCC suffers from reduced walkability and connection to the Cromwell town centre, due to the presence of State Highway 8B and the public green space between State Highway 8B and Murray Terrace. In reality therefore, commercial activity on the Wooing Tree site would function separately from the Cromwell Town Centre and be its own destination from a retail economic and centre functionality perspective¹⁸.
- 6.12 While the underpass provides a pedestrian and cycle link, the reality around the amount of pedestrian flow between centres is likely to be small and have no meaningful benefit to either centre¹⁹.
- 6.13 The ME assessment fails to assess the potential impacts of WTCC diverting tourist and tourist spend away from the Cromwell Town Centre and Heritage Precinct based on the centres new higher profile State Highway 8B location. Furthermore, an internalised commercial centre at the northern end of the Application Site (as per Plan Change 12) is a different proposition to the commercial centre proposed in the Application²⁰, despite the applicants assertion otherwise²¹.
- 6.14 The WTCC would add some 24,000m2 retail and commercial space within the Cromwell urban area. The nature and scale of the WTCC would have significant adverse effects on the Cromwell Town Centre and Arts and Old Cromwell Heritage Precinct commercial areas and activities.

¹⁸ Heath page 7

¹⁹ Heath page 7

²⁰ Heath page 8

²¹ The applicant asserts the WTCC is a mere relocation of the hospitality and neighborhood center and is not increasing the size nature or form of the center provided for as a result of PC12

7. THERE ARE NO MEASURES PROPOSED THAT OUTWEIGH OR JUSTIFY THE ADVERSE EFFECTS OF THE APPLICATION ON THE ENVIRONMENT

7.1 With respect to the effects on the Cromwell Town Centre and Heritage Precinct, while the WTCC would add to Cromwell’s tourism related activities, there has been no assessment of duplication of other tourist activities or store offerings and diversion of spend away from *current stores*. As Mr Heath observes²²

“The very reason for moving the Wooing Tree Commercial Centre (to improve economic performance) is the very reason Property Economics has concerns about increased impacts (relative to the Plan Change 12 baseline). Without higher tourism numbers (as in the current and foreseeable environment), this increased economic performance can only realistically come from diverting spend away from other commercial and tourist destinations in Cromwell. As a vineyard themed tourist destination, the Wooing Tree commercial centre should be able to be successfully located anywhere on the site. The move to State Highway 8B with improved profile and accessibility seems clearly targeted at increasing the ability of the Wooing Tree centre to draw more spend from the local market.”

and²³

“From an economic perspective, and being a tourist village/destination, the need to be located on and have exposure/visibility to State Highway 8B diminishes. Linking the tourist village’s location and accessibility from State Highway 8B to commercial viability of the destination raises concern the

²² At page 8

²³ Heath page 11

village is more extensive than can be sustained by tourists alone and its location means the village is better placed to draw sales away from the Cromwell Town Centre...”

- 7.2 It is notable and significant that ME has not measured the trade diversion of retail sales from the Cromwell Town Centre to the Wooing Tree commercial village as a result of the proposed new location, particularly against the background of reduced tourist volumes in Cromwell as a result of the global pandemic.
- 7.3 It is submitted that the applicant has not proposed any measures to offset or compensate for any actual or potential effect on the environment that would result in a positive effect for the environment.

8. THE APPLICATION IS CONTRARY TO THE OBJECTIVES AND POLICIES OF THE RELEVANT HIGHER ORDER PLANNING DOCUMENTS & THE SPATIAL PLAN

Spatial Plan

- 8.1 Clause 31(1)(d) allows the Panel to consider other relevant matters. The Council agrees with the applicant²⁴ that a key consideration for the Panel is the Spatial Plan.
- 8.2 The Spatial Plan is a recently provided Council strategy intended to map out the future growth direction of Cromwell. While technically its not a planning instrument under the RMA, it is an adopted policy of the Council, intended to set out the Council’s vision for managing growth within the Cromwell area.
- 8.3 The application report states:²⁵

²⁴ Tattico report page 135

²⁵ Tattico report page 20

“... a key aspect of this proposal is to enable development consistent with the Council’s vision for this land, notwithstanding that the Council is yet to undertake the Plan Changes to amend this zoning from essentially low density to the identified Medium Density Residential (“MDR”) and High Density Residential (“HDR”).

8.4 The application goes so far as to state that the District Plan provisions are outdated and the planning approach has effectively been replaced by the Spatial Plan. In this respect, the applicant places a great deal of emphasis (and reliance) on the Spatial Plan in support of intensification of residential activity on the Application Site, and for the WTCC – yet is notably silent as to the fact that the Spatial Plan identifies the Application Site to be strategically located for residential development only.

8.5 It is submitted that the application is not consistent with the future development strategy set out in the Spatial Plan. This is discussed in some detail in the evidence of Ms Brown. In summary, the Spatial Plan:

- a) anticipates *residential* development for the Wooing Tree Site as one of a number of potential residential infill locations, subject to specific connectivity in a manner to integrate effectively to all other parts of Cromwell’s urban fabric.
- b) the Plan’s development strategy is for *two* commercial nodes within only;
 - the existing Town Centre area as an updated mixed-use commercial, office and service centre, and
 - an Arts and Culture Precinct focusing on lakeshore/visitor/cultural and other attributes which include the remnant Cromwell main street, and significant Maori cultural

values associated with the meeting of the Clutha
Mata- Au and Kawarau Rivers

- c) enabling effective and efficient infrastructure and the sustainable management of the natural and physical resources within the existing urban environment.

8.6 The WTCC proposal for commercial /business development would have a similar footprint as that of the Cromwell Mall i.e. the proposed commercial precinct within the Wooing Tree Site and the retail hospitality and similar activities with the Mall have a corresponding footprint; each being approximately 2.5ha

District Plan

8.7 The District Plan provisions were and are inherently related to a ‘vineyard village concept’ where a range of activities occur in relation to some on- site rural production with plantings retained for commercial/theme/branding/marketing activities, in a manner *complementary* to an onsite residential environment and a visitor environment. These provisions are discussed by Ms Brown in her evidence.

8.8 Within the BA2 zone concept planning envisaged two small activity nodes the largest of which was located in the northern part of the zone which included approximately one third of the zone area retained in open space plantings. Ms Brown gives the opinion that the extent of business development within the Wooing Tree application is equivalent to the retail and core business footprint of the town centre, and thus would double Cromwell’s existing capacity. Over supply and diversion of the tourism spend from other parts of Cromwell negatively impacts on the two existing commercial nodes. She opines that there is no demonstrated need for additional commercial space apparent at this time and further that while WTCC proposals may be

appropriate to a Tier 1 urban environment, the township of Cromwell is not predicted to meet even preliminary levels for any urban environment until beyond 2050²⁶.

Higher Order Planning documents

8.8 The NPSUD and Regional Planning framework are examined in some detail by Ms Brown. While Cromwell may not be a Tier 1 or 2 urban environment (its population will fall short of 10,000 for some years)²⁷, many of the matters addressed within the NPSUD are commonly accepted growth management and urban design criteria²⁸. Ms Brown finds after detailed analysis that the residential component of the application meets the NPSUD in part, with the fast tracked residential development occurring only to a reduced density consistent with PC12 – that is, 120 dwellings.

8.9 Ms Brown finds that the WTCC will not provide for the economic and social wellbeing of people and communities within Cromwell’s urban environment and are inconsistent with Objectives 1, 4 and 6 of the NPSUD and associated policies addressing well-functioning integrated urban environments.

9. CONCLUSION

9.1 In determining the Application, the expert consenting panel must have regard to the actual and potential effects of the Application, proposed offsetting or compensation measures and the provisions of relevant planning documents. This assessment must be undertaken subject to Part 2 of the RMA and the purpose of the Fast Track Act.

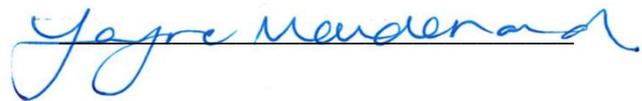
²⁶ At paragraph [69]

²⁷ Brown paragraph [29]

²⁸ The Spatial Plan embodies many of these growth management and design criteria

- 9.2 Furthermore, unlike listed projects, the Panel has a wide discretion to consent or decline a referred application. Subject to the purpose of the Fast Track Act being achieved, this enables the Panel to consent acceptable component parts and decline unacceptable components to the extent that a meaningful project remains. It is submitted that such an outcome is justifiable and warranted here.
- 9.2 Although the Fast Track Act provides a new framework for considering resource consent applications, it is crucial that good planning outcomes should not be sacrificed for short term economic benefits.
- 9.3 For the reasons given, which will be expanded on if a hearing is held, it is submitted that components of the Application do not reflect a good planning outcome and should be declined, or significantly modified as addressed in the evidence.

DATED this 30th day of June 2021



Jayne Macdonald
Counsel for Central Otago District Council