

BEFORE THE QUEENSTOWN LAKES DISTRICT COUNCIL

IN THE MATTER of the Resource management Act (Act)

BETWEEN of the QLDC Proposed District Plan [Part One]

STATEMENT OF PLANNING EVIDENCE OF BEN FARRELL

FOR [RESPECTIVELY]:

**Real Journeys Limited (621/1341)
Cardrona Alpine Resort Limited (615)
Te Anau Developments Limited (607/1342)
Ngai Tahu Tourism Limited (716)
D & M Columb (624)
G W Stalker Family Trust (535)
Mike Henry, Mark Tylden, Wayne French, Dave Finlin, Sam Strain,
Wakatipu Equities limited (515)
Cook Adam Trustees limited/C & M Burgess (669)
Slopehill Properties limited (854)
Bobs Cove Limited (712)
Glentui Heights Limited (694)
Sanderson Group Limited (404)
Scott Crawford (842)**

Dated 29 February 2016

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QUALIFICATIONS AND EXPERIENCE

1. My full name is Ben Farrell. I am an Independent Planning Consultant employed by John Edmonds & Associates Limited, a firm of independent planners and project managers based in Queenstown.
2. Over the last 17 years I have been heavily involved in New Zealand's environmental and resource management sector. I studied planning, parks, recreation, tourism and resource management at Lincoln University from 1999 to 2003 graduating with a Bachelor of Resource Studies and a Master of Environmental Policy. During my studies I was employed by Auckland Regional Council, Greater Wellington Regional Council, and Connell Wagner Limited (in Christchurch). Since graduating, I have been employed as a planner by Upper Hutt City Council (2004), Boffa Miskell Limited (Wellington 2005-2010), Andrew Stewart Limited (Wellington and Invercargill 2013-2015), and the Southland Regional Council (2014-2015). During 2010-2013 I was a self-employed planning consultant, working primarily for the New Zealand Wind Energy Association and Ryman Healthcare Limited on a range of resource management policy and project developments across New Zealand.
3. Over the last 13 years I have provided strategic and statutory planning advice on a wide variety of resource management projects for a wide variety of clients or government employers, including the following to varying degrees:
 - a. The preparation of best practice development standards/guidelines in relation to resource management issues (including landscape assessment);
 - b. The preparation and assessment of numerous resource consent applications, notices of requirements, and Assessments of Effects on the Environment reports for a range of projects and applicants;
 - c. Preparation and implementation of National Policy Statements, seven regional policy statements, two unitary plans, and 19 district/regional plans; and
 - d. Planning advice to local authorities, iwi authorities, and private development interests in regard to urban growth (including town centres) and transportation issues and development.
4. Since moving from Wellington to the south island in 2014 I have worked primarily on regional planning issues in Otago and Southland, and also local Queenstown district (the district) planning issues, including:
 - a. Preparation of s42A reports for six chapters of the Proposed Southland Regional Policy Statement;
 - b. Preparation of the Draft Regional Water Plan for Southland 2015;
 - c. Preparation of numerous submissions on the Proposed Otago Regional Policy Statement 2015 (PRPS);
 - d. Preparation of numerous submissions on the Proposed Queenstown Lakes District Plan 2015 (PDP);

- e. Strategic planning advice to a range of parties with a strong interest in the management of the district's resources; and
 - f. Preparation of various resource consent applications for new developments within the district.
5. In addition to my qualifications and experiences as a planner I am a full member of the New Zealand Planning Institute. I was on the Institute's Wellington regional branch committee from 2004-2013 and I was chairman of that branch in 2010 and 2011. I currently sit on the editorial panel of the Institute's journal (Quality Planning) and the Institute's local branch committee.

CODE OF CONDUCT

6. While this matter is not before the Environment Court I confirm I have read and agree to comply with Code of Conduct for Expert Witnesses (Environment Court Practice Note 2014) as if this matter were before the Court. I confirm this evidence is within my area of expertise except where I state that I am relying on facts or information provided by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
7. In preparing this evidence I have reviewed the following planning documents, reports and statements of evidence of other experts giving evidence are relevant to my area of expertise, including:
- a. Section 42A Report prepared by Mr Pickard in relation to Proposed Chapter 1 (introduction) and 5 (tangata whenua), inclusive of the attached s32 reports and various background reports referred to in these documents;
 - b. Section 42A Report prepared by Mr Paetz in relation to Proposed Chapters 3 and 4, inclusive of the attached s32 reports and expert evidence;
 - c. Section 42A Report prepared by Mr Barr in relation to Proposed Chapter 6, inclusive of the attached s32 reports and expert evidence;
 - d. Summary of submission chapters prepared by QLDC¹;
 - e. Submissions by those parties I am presenting evidence on behalf of at this hearing²;
 - f. Operative Queenstown Lakes District Plan (ŌDP); Proposed Queenstown Lakes District Plan (PDP); Operative Regional Policy Statement; Proposed Regional Policy Statement; National Policy Statement for Freshwater Management (NPSFM); National Policy Statement for Electricity Transmission (NPSET); National Policy Statement for Renewable Electricity Generation (NPSREG).

¹Downloaded from: <http://www.qldc.govt.nz/planning/district-plan/proposed-district-plan/submission-summary-by-part/>

² Real Journeys Limited (621/1341), Cardrona Alpine Resort Limited (615), Te Anau Developments Limited (607/1342), Ngai Tahu Tourism Limited (716), D & M Columb (624), G W Stalker Family Trust (535), Mike Henry, Mark Tylden, Wayne French, Dave Finlin, Sam Strain, Wakatipu Equities limited (515), Cook Adam Trustees limited/C & M Burgess (669), Slopehill Properties limited (854), Bobs Cove Limited (712), Glentui Heights Limited (694), Sanderson Group Limited (404)

8. I confirm I am familiar with the Queenstown district and Otago and Southland Regions. I have worked and resided in the regions since 2013, owned land in the Otago Region since 2008³, and throughout my life have visited family and friends or visited parts of the district/regions on numerous occasions for business and pleasure.
9. I have prepared my evidence based on my:
 - a. expertise as a planner familiar (summarised above) with the preparation of resource management policy documents and plans, consent and designation decision making processes⁴;
 - b. familiarity with the above mentioned reports, evidence, and planning documents;
 - c. role as a local planning practitioner having to deal with the administration of the QLDC district plan day-to-day and
 - d. familiarity with the Queenstown district and Otago and Southland Regions.

SCOPE OF EVIDENCE

10. I have been asked by the abovementioned submitters to prepare planning evidence relation to their respective interests in Chapters 3, 4, 6 of the PDP. For the purposes of this evidence, I have grouped these interests respectively as propositions which I address separately:
 - a. Plan structure and plan language
 - b. Urban growth boundaries
 - c. Providing for retirement villages
 - d. Increasing housing density to accommodate family
 - e. Recognising and providing for tourism
 - f. Rural living in the Wakatipu Basin
 - g. Recommended amendments
11. My evidence also addresses the relevant statutory framework, discussed in the s42A reports.

³ Outside the Queenstown district

⁴ Including plan change and designation processes

EXECUTIVE SUMMARY

Qualifications and experience

12. My name is Ben Farrell. I am an expert planning witness with a variety of planning experience across New Zealand. I am based in Queenstown and deal with the QLDC district plan on a day-to-day basis. I have been engaged by various submitters to provide planning evidence in support of their respective interests in the PDP.

Statutory framework

13. The matters listed in section five of the respective s42A reports are generally those which should be evaluated. An exception is the failure to recognise the relevance of national policy statements.

Plan structure and plan language

14. The PDP is more user friendly than the ODP and QLDC should be complemented for this. Particular components supported including: the provision of an overriding strategic directions chapter (and Councils rationale for providing it); the mapping of ONFLs in the PDP, which is important; and Councils attempt to condense the layout. However, the overall plan structure should be simpler, with unnecessary chapters and provisions removed (including chapters 4 and 6). I also consider the structure of the PDP should be amended to provide a separate water chapter to more appropriately recognise and provide for the significant of freshwater.
15. The rationale for introducing new language (that departs from Part 2 of the Act) is not supported. It is not necessary and will give rise to unnecessary costs associated with administration of the district plan.

Urban growth boundaries

16. The rationale for introducing Urban Growth Boundaries (UGBs) and promotion of consolidation of urban development within those boundaries is supported. However, the methodology/criteria used to locate the UGBs are not transparent and its application does not appear to be thorough or consistent.

Providing for retirement villages

17. The PDP should be amended so that it satisfactorily recognises and provides for the needs of the elderly in terms of the demand for new retirement village accommodation in Queenstown. The current strategic direction chapter is supported on the assumption that Goal 3.2.6, objective 3.2.6.1 and the supporting policies capture the development of new retirement villages.

Increasing housing density to accommodate family

18. Chapter 3 should be amended to provide for increased residential density that enables family members to live together on the same site or near each other.

Recognising and providing for tourism

19. Chapter 3 (and chapters 4 and 6 if retained) should be amended to ensure it satisfactorily recognises and provides for tourism across the district, inclusive of the supporting role of infrastructure, transport and visitor accommodation.

Rural living in the Wakatipu Basin

20. Chapters 3 and 6 overstate and give inappropriate weight to the protection of primary production activities and the rural character of the Wakatipu Basin. These chapters should be amended to differentiate the policy framework applying to the RLC across the district to recognise the positive contribution of, and to enable, rural living opportunities in the Wakatipu Basin.

Summary of amendments

21. I recommended various amendments to Chapter 3 be provided and suggest that Chapters 4 and 6 be deleted (although I suggest some of the provisions in Chapters 4 and 6 be promoted to Chapter 3 or demoted to respective zone chapters).

STATUTORY FRAMEWORK

22. I consider the matters listed in sections five of the s42A reports are generally those which should be evaluated by you. An exception is that the s42A reports do not identify the national policy statements as being relevant to the evaluation of the respective chapters.
23. In my opinion, excluding the NZCPS, the three remaining national policy statements⁵ are very relevant to the evaluation of proposed chapters 3, 4, and 6 (and the whole PDP). Generally, I consider provisions in national policy statements should be afforded very high weighting when decision-makers:
- a. Identify a gap in the local or regional planning framework that is addressed in a national policy statement;
 - b. Evaluate the appropriateness of a provision in any local or regional planning instrument that is not consistent (or conflicts) with the direction provided in a national policy statement.

⁵ NPSFM (Freshwater Management); NPSET (Electricity Transmission); NPSREG (Renewable Electricity Generation)

PLAN STRUCTURE

24. The PDP is more user friendly than the ODP and I complement QLDC for this. I am particularly supportive of:
25. The provision of an overriding strategic directions chapter and generally support Council's rationale for providing it (as discussed in the evidence of Mr Paetz). In my opinion the strategic directions chapter is particularly useful as it can:
 - a. Succinctly frame the particularly important matters that need to be addressed in order to achieve the sustainable management of the district's resources;
 - b. Once agreed by you, provide a frame of reference to provide you with direction about the appropriateness of other [lower tier] provisions in the PDP;
 - c. Provide a frame of reference to plan administrators (including decision-makers), guidance about the overall appropriateness of future consent applications and plan changes, particularly if lower tier provisions conflict with each other in a particular case.
26. I also particularly support the identification of all the district's ONFLs and inclusion of them on the district plan maps. I concur with Mr Paetz on this matter.
27. However, in my opinion the current framework of the plan can and should be improved.
28. The current three hierarchical approach (discussed in Mr Paetz's s42A Report) works well with a single strategic directions chapter but the tangata whenua, urban, and landscape chapters create uncertainty and unnecessary repetition.
29. I do not agree that repetition is helpful or appropriate because it reinforces a particular point. The importance of particular resource management issues/matters is satisfactorily reflected by its location in the strategic directions chapter.
30. I acknowledge the statutory importance of the tangata whenua chapter and recognise it contains matters intended to apply across the district and across all provisions of the district plan (my understanding). I therefore support the inclusion of a separate tangata whenua chapter alongside the strategic directions chapter.
31. In my opinion chapters 4 and 6 result in the PDP affording greater recognition of urban growth issues and protection of the district's landscapes over and above other equally important resource management topics that face the entire district, for example:
 - Freshwater management;
 - Tourism;
 - Transport;
 - Infrastructure (including electricity generation and supply); and
 - Energy.

32. The above topics affect the whole of the district, not just parts of it. I observe the district's urban areas cover a very small proportion the district (about 60km² or 1% of the district⁶). By comparison, the combined lake areas⁷ (which are recognised as Statutory Acknowledgement Areas and are to be managed as a matter of national significance under the NPSFM) total about 7%⁸ of the district. I also understand Chapter 6 addresses values associated with the rural zone (including water) and are not intended to apply across the district (urban areas and certain zones are excluded). Therefore, under the current district plan structure, I believe the provisions in chapters 4 and 6 can be appropriately located within the higher order chapter 3 or the lower order zone chapters.
33. Locating provisions in the lower order zone chapters will enable sharper (finer grained) policies to be written as they will be tailored to suit the particular zone. This will avoid the need for plan users and decision-makers to interpret and weigh multiple hierarchical provisions and overall result in less administration costs and improved effectiveness . making them more appropriate. More specifically, I believe there will be significant improvements in the administration of the district plan, on a day-to-day basis, if the objectives and policies in the strategic direction chapter are rarely utilised, for example only in situations when provisions in lower order chapters compete, or in the consideration of plan changes.
34. In my opinion a suite of structural changes can be made to the PDP to make it more user friendly and effective overall. These are identified below and illustrated in Figures 1 and 2 below. In summary:
- Provisions within chapter 4 and 6 (which could provide strategic direction and do not overlap with provisions already contained in Chapter 3), could be promoted to Chapter 3;
 - Provisions within chapter 4 and 6 (which do not provide strategic direction and do not overlap with other provisions), could be demoted to separate zone chapters (especially where they relate to the management of a specific resource/zone);
 - Provisions within chapter 4 and 6 that overlap with other provisions in the district plan and can be deleted; and
 - Overall I consider chapters 4 and 6 are not necessary and can be deleted.
35. Finally, as a small point, I consider structure would benefit from a contents page as this would help with navigation around the document.

Provision of a separate Water Chapter

⁶ Based on a very crude and conservative mapping exercise I carried out using the QLDC online GIS mapping and land area measuring tools. Specifically, I mapped the approximate area of the urban zones under the ODP, which equated to about 60km², being 1% of the 8,719km² district (district land area sourced from Wikipedia).

⁷ (Wakatipu, Wanaka, Hawea)

⁸ Areas sourced from Wikipedia (totalling 624km²: 291km² (Wakatipu), 192km² (Wanaka), 141km² (Hawea))

36. Submitters Real Journeys and Te Anau Developments requested that the water provisions in Chapters 12 and 21 respectively be provided in a separate water chapter.
37. For the following reasons I consider it is appropriate that the PDP provides a specific chapter to recognise and provide for freshwater as a significant resource:
- a. The district's water resources are significant. This is recognised in the opening purpose statement of the PDP where 'pristine water' is listed as one of the district's special qualities;
 - b. The lakes and rivers create a relative large resource, the lakes along comprising about 7% of the district's area (large relevant to the urban resource as identified above).
 - c. Under the Act the national significance of fresh water for all New Zealanders and Te Mana o te Wai is to be recognised in accordance with the NPSFM. In my opinion Te Mana o te Wai translates (more or less) to 'the mana of the water'. Te Mana o te Wai is a philosophy that puts the inherent health of the water and its ability to provide for the people and environment at the forefront of managing freshwater;
 - d. The district's main rivers and lakes are recognised as significant resources protected as Statutory Acknowledgement Areas under the TRONT Settlement Act.
 - e. The RPS and PRPS recognise the significance of water resources and require district plans to consider controls within district plans necessary to protect the district's water resources.
 - f. The PDP ~~hides~~ the water provisions in the back of chapters 12 (town centre) and 21 (rural). There is also reference to flood protection works in the utilities chapter. In my opinion this does not recognise the national significance freshwater or te mana o te wai. This also limits the effectiveness of integrating water related provisions with other activities that affect or may be affected by use and development of lakes and rivers, for example: subdivision and urban development, waterfront activity and development that occurs on both water and land (including wharves, jetties, marinas), and surface water activities including water transport.
 - g. In my experience there are locally significant resource management issues relating to the use of surface water (with increasing tension about the allocation of rights to use and occupy water for commercial transport and recreation activities). This demand, and tension, can be expected to increase along with the growth of tourism.

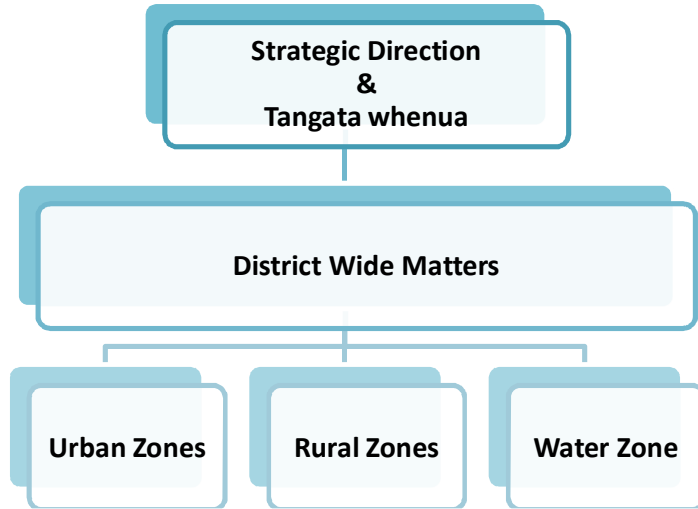


Figure 1 Potential alternative structure recognise the significance of freshwater and to make administration of the PDP more user friendly and cost effective

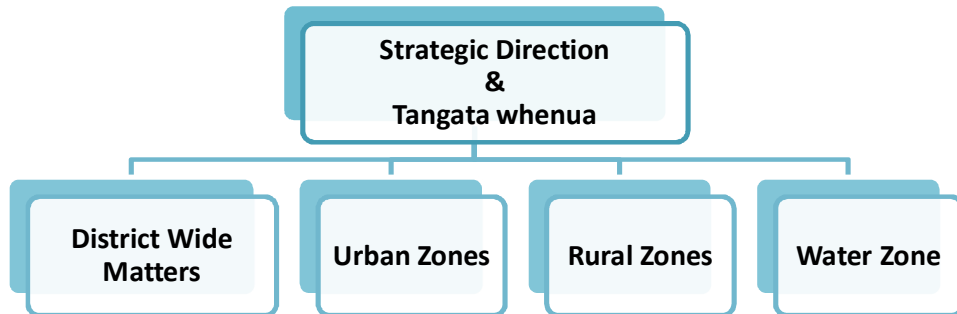


Figure 2 Potential alternative structure recognise the significance of freshwater and to make administration of the PDP more user friendly and cost effective

PLAN LANGUAGE

Goals

38. Prior to reading Mr Paetz's report I did not support the introduction of Goals in the district plan as they did not appear to serve any statutory meaning and it was unclear how they would be used by decision-makers on a case-by-case basis. The rationale provided in the s42A report by Mr Paetz clarifies this point and I have no longer have concerns about the introduction of Goals for the reasons provided⁹. However, I consider it would be helpful to plan administrators and decision-makers to provide an explanation in the PDP to clarify that the Goals are in effect the district plan's Anticipated Environmental Results.

Special qualities

39. Section 3.1 lists the Queenstown Lakes District's special qualities. While I generally support these qualities it is not clear (from the Council reports) how these qualities were identified and it is not clear what role these special qualities are intended to serve in terms of the structure or administration of the district plan.
40. I support retention of the special qualities in the PDP but recommended they be provided in the form of a specific goal or objective, which the other strategic goals and objectives can link back to.

Introducing new terms - landscape provisions

41. In respect of the numerous provisions relating to the management of the district's landscapes, I do not agree with the reasons provided by Mr Paetz and Mr Barr¹⁰ that it is appropriate to introduce new language/terms that specifically departs from language already used in Part 2 of the Act, for example the use of ~~degrade~~, ~~minimise~~ or ~~protect~~ instead of avoid, remedy or mitigate.
42. In particular, I am not aware of any justification for the suggestion that it is appropriate to introduce new language because the legislative framework ~~needs to be given local expression~~ or ~~refraining from the repetition of RMA phrases and similar jargon will encourage readers to engage with the PDP~~ or that ~~using language already provided in the Act will alienate the wider community from the PDP~~. I do not consider the use of ~~avoid, remedy, or mitigate~~ to be meaningless. On the contrary it has been the subject of considerable debate and interpretation and is established in case law. Introducing different language will in my opinion give rise to the need for these terms to be interpreted and re-interpreted on a case-by-case basis. This will escalate costs, especially if Council's decisions are contested and the Court is required to make new case law.

⁹ Par 12.4

¹⁰ Pars 9.32-9.37

43. In my experience the introduction of alternative language as proposed will lead to unnecessary costs associated with plan administration at no discernible benefit. As an example, the s42A Report on landscape identifies two different meanings of degrade:

*9.37. ... The Oxford English Dictionary¹² describes the meaning of degrade as **'lower the character or quality of'**. This is the matter at issue which the Landscape Chapter addresses.*

*9.85 However it is recommended the word 'disruption' is replaced with 'degradation', being considered a more appropriate word in terms of its meaning, **'to lower the rank or quality of'**, and consistent with other policies in the Landscape Chapter.*

44. In this example a single author has provided two different meanings of the term degrade inviting or requiring different interpretations to be reached. This inconsistency demonstrates how easy it is for practitioners to arrive at different interpretations. I expect the issue will be exacerbated when different plan users and decision-makers are invited to interpret new terms.
45. If new terms are to be introduced, I consider it is appropriate that they be supported by a common/agreed definition along with concise supporting policies to assist plan users and decision-makers by removing ambiguity.

degrade

46. If alternative language is to be used, then less ambiguous language could be used. For example the term degrade could be replaced with its intended meaning of lowering the quality of.

URBAN GROWTH BOUNDARIES

47. I support the Council's rationale for introducing Urban Growth Boundaries (UGBs) and promotion of consolidation of urban development within those boundaries (for the reasons discussed by Mr Paetz). Notwithstanding this I consider there are real and significant costs to be borne by individuals and the community if an UGB location unnecessarily restricts urban development, particularly land adjacent to existing urban settlements. These primarily relate to the costs and delays associated with the district plan change or resource consent application processes, which will in my opinion result in missed or lost opportunities for using land for housing supply.
48. Therefore, if UGBs are to be retained as a method to implement certain objectives, I am of the view that it should be specified in the PDP as a policy to make transparent the methodology/criteria used to locate them. In my opinion the PDP does not contain such a policy and the proposed UGB locations do not appear to be based on any robust site specific analysis. In this regard, based on the information I have reviewed to date, I consider some of the proposed UGB locations lack sufficient analysis to warrant their specific location. In particular, they fail to give due consideration to the potential for appropriate urban development on rural zoned land adjacent to existing urban settlements. I do not intend to give examples (on the basis that this matter is to be heard by you at a later date).
49. Based on the above I consider:
- a. The district plan should be amended to include a specific policy that identifies the methodology/criteria used to locate the UGBs (this policy can be used by you at a later date to test them against respective submissions and evidence);
 - b. The abovementioned policy could be provided in the strategic directions chapter;
 - c. In the absence of such a specific policy the UGBs should be deleted from the district plan.

PROVIDING FOR RETIREMENT VILLAGES

50. I consider an issue facing Queenstown, which is not addressed in the PDP, is the need to accommodate elderly people, particularly within new retirement villages.
51. There is currently a lack of land available to develop a comprehensive retirement village and I understand retirees are leaving the district because there are no modern retirement villages for them to move into¹¹. In my opinion Queenstown will face increasing demand from elderly residents to live in retirement villages, particularly as the population continues to grow.

¹¹ I assume this based on discussions I've had with three retirement village developers/operators and personal discussions with a variety of residents within the district.

52. I am aware of three¹² current retirement village proposals in Queenstown, all of which are proposed to be located on rural zoned land within the Wakatipu Basin outside the proposed UGBs: Ayrburn Retirement Village¹³; Arrowtown Lifestyle Retirement Village¹⁴; and Ladies Mile Country Club (Sanderson Group)¹⁵. These sites are all zoned Rural General and development of a retirement village on these sites under the current planning framework presents a significant consent hurdle.
53. While the ODP and PDP define retirement villages (which I think is a good starting point), there does not appear to be any recognition of or provision for the particular requirements of comprehensive retirement villages. In my experience this includes (but is not limited to) the ability to acquire a site that is:
- a. Reasonable flat and large enough to accommodate a village¹⁶;
 - b. A desirable location with ample sunlight and part of a safe and established residential community;
 - c. Reasonably central to the district (i.e. so that it is not far to travel from out of town or other parts of the district);
 - d. Reasonably close to retail/commercial activities and offsite healthcare practitioners; and
 - e. Available and affordable (to ensure housing can be offered at a relatively affordable price to residents while providing a return on investment).
54. I understand¹⁷ the DCM relied on by Council in setting its UGB and zoning regime under the PDP assumes provision for housing for the elderly. I assume this is because the DCM relies to a large extent on the findings of the research and evidence of Mr Colegrave, which does not analyse the specific implications of the projected growth for the district's housing supply and affordability issues. However, based on the above I am of the opinion Council's modelling has excluded or underestimated the ability to accommodate housing for the elderly, in particular the need to provide for retirement villages. I consider the following statement in Mr Colegrave's evidence (par 6.3) should be taken to apply to elderly residents, as much as it does other types of residents:

¹² I am aware of a fourth retirement village which was being considered in Park Street Queenstown. However, I understand based on discussions with the developer/operator that this proposal is not likely to proceed due to concerns expressed by neighbouring parties.

¹³ A proposed village of up to 201 dwellings plus associated care facilities and community amenities on the 45.7ha site at 341-343 Arrowtown-Lake Hayes Road, near Arrowtown.

¹⁴ A proposed village on 12-15ha flat land off McDonnell Road near Arrowtown. It would contain 90-120 villas, 40-55 apartments, A 100 bed aged care facility offering rest home, hospital and dementia level care, Community facilities including restaurant and café, lounges, library, swimming pool, gym and bowling green (for the exclusive use of residents), Extensive gardens and landscape areas in keeping with the rich tradition of an Arrowtown rural style.

¹⁵ No details available but the site comprises about 30ha of flat land located between the Shotover Country and Lake Hayes Estate settlements along the Ladies Mile.

¹⁶ In my experience a village typically includes hundreds of single storey housing units, one or more larger buildings that accommodate elderly requiring a higher level of care and the supporting recreation and servicing activities, open space and landscaping, internal roads and parking

¹⁷ I assume this based on discussions I had with QLDC staff in early February.

“...the projected growth will likely present considerable challenges for ensuring that existing supply and affordability problems do not become exacerbated”.

55. In terms of the above, I believe it is important that you recognise that strategic Goal 3.2.6 and supporting policies 3.2.6.1.1 and 3.2.6.1.2 apply to the enablement of housing for the elderly and new retirement villages.

INCREASING HOUSING DENSITY TO ACCOMMODATE FAMILY

56. In my opinion it is increasingly difficult for families in Queenstown to co-locate on or near the same property. In order to help achieve the purpose of the Act (specifically enablement of people to provide for their social, economic, and cultural well-being and for their health and safety) I consider it is appropriate to ensure that families have real opportunities to live together, particularly aging residents. At a minimum, I think it is appropriate that proposals for new dwelling units to be used by family members, particularly aging members, should be enabled (assuming effects on the environment are avoided, remedied or mitigated).
57. In this regard, with some amendment¹⁸ I support the relief sought in the submission by Slopehill Properties to insert new policy into Chapter 3 to enable residential units where the primary use of the increased density is to accommodate family:

Policy - Provide for increased residential density that enables family members to live together on the same site or near each other.

58. I consider the above policy sits very well under Goal 3.2.6: ~~%Enable a safe and healthy community that is strong, diverse and inclusive for all people+and is appropriate for implementing Objective 3.2.6.2 %Ensure a mix of housing opportunities+~~

¹⁸ The above suggested policy differs from the relief sought by Slopehill Properties in that it does not contain reference to ~~%including residential units outside approved building platforms in rural areas+, which I consider too detailed for Chapter 3.~~

RECOGNISING AND PROVIDING FOR TOURISM

59. I agree with the respective comments in the reports/evidence by Mr Paetz, Mr Colegrave, Mr Glasner, Mr McDermott, and Ms Read who all identify that tourism as the main industry in the District and therefore very important to the economy of the Queenstown Lakes District¹⁹. This supports the QLDC Economic Development Strategy²⁰ (February 2015) which states that:

“Tourism underpins the District’s economy, based on the outstanding natural amenities, and supports a range of industries including accommodation and food services, arts and recreation services, retail trade and rental services. Queenstown Lakes is a premier visitor location and accounted for 9.4 percent of national visitor expenditure in 2013/14 (year ended March). The District is a global destination, with a high proportion of international visitors. Queenstown Lakes experiences less seasonality in visitor expenditure than other tourism areas of New Zealand, having a winter and summer peak compared to a single peak for other areas.”

60. The Otago Economic Overview 2013²¹ identified that:

“Between 2003 and 2013, the Tourism sector in Queenstown Lakes out-performed the sector nationally in terms of growth in employment, GDP and the number of business units. In terms of GDP alone, Tourism in the district has grown more than twice as fast as it has nationally over the longer-term.”

61. In addition to the above, the number of visitors to New Zealand and Queenstown is expected to grow. The New Zealand Tourism Forecasts for 2015-2021²² prepared by MBIE stated that:

“Visitor arrivals to New Zealand are expected to grow 4 per cent a year, reaching 3.8 million visitors in 2021 from 2.9 million in 2014.”

62. Based on advice provided to me by staff at Real Journeys Limited, I believe that, going on past performance, the Queenstown Lakes District can expect to receive a greater proportion of this projected increase in visitors compared to other regions. The following table illustrates the change in numbers of Real Journeys passenger numbers between 2010 and 2015:

Year	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16
Change	-1.5%	-11.65%	+6.76%	+6.5%	+10.88%	+11.40%

Figure 2: Actual change in Real Journeys passenger numbers 2010-2015²³

¹⁹ 12.27 Paetz s42A report; 3.1 Glasner evidence; 21(b) McDermott; 4.2 Read evidence

²⁰ <http://www.qldc.govt.nz/assets/Uploads/Council-Documents/Strategies-and-Publications/Queenstown-Lakes-Economic-Development-Strategy-Consultation-Document.pdf>

²¹ <http://www.centralotago.govt.nz/Pics/Hotel/CentralOtagoRTO/Brochure/BERL%20Otago%20Economic%20Overview%202013.pdf>

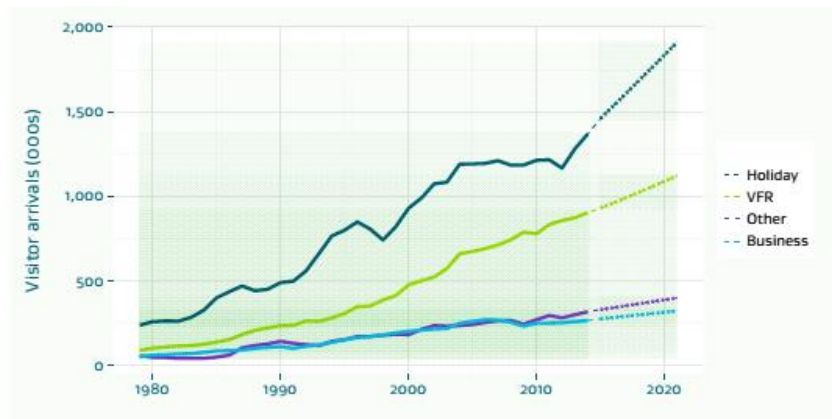
²² http://www.mbie.govt.nz/info-services/sectors-industries/tourism/tourism-research-data/international-tourism-forecasts/documents-image-library/tourism_forecasts_2015-2021.pdf

²³ Source: Real Journeys (personal communication, Feb 2016)

63. In light of the above I consider the PDP does not afford appropriate status to the provision of the predicted growth in tourism activities, including a need provide for the required tourism industry infrastructure (namely transport and visitor accommodation).
64. In this regard I support the relief sought by Real Journeys (and others) to ensure that the strategic direction chapter includes specific goals and objectives with respect to the entire relevant infrastructure which is required to support the Tourism Industry (including visitor accommodation and transport infrastructure, including public transport).
65. The November 2012 Economic Futures Task Force Report recorded that:

“The district’s infrastructure is generally adequate for the standing population. However it does struggle to cope with the influx of visitors during peak periods, both summer and winter.”²⁴
66. Visitor arrivals to the district and the District’s population have increased significantly since 2012. This, coupled with advice I have received from Real Journeys staff, I believe the pressure on tourism related infrastructure has escalated. For instance from the 2013 census Statistics New Zealand advises that the District’s population has increased by 22.6% since the 2006 Census which has brought more vehicles into the District²⁵. Further from NZTA statistics the New Zealand rental vehicle fleet increased 13% from 2006 till 2013 during the GFC when international visitor arrivals were largely static²⁶.

Figure 13: Growth of international visitors will be driven by holiday and VFR visitors



Source: Statistics New Zealand, NZIER

Figure 3²⁷

²⁴http://img.scoop.co.nz/media/pdfs/1302/Economic_Futures_Task_Force_Report.pdf

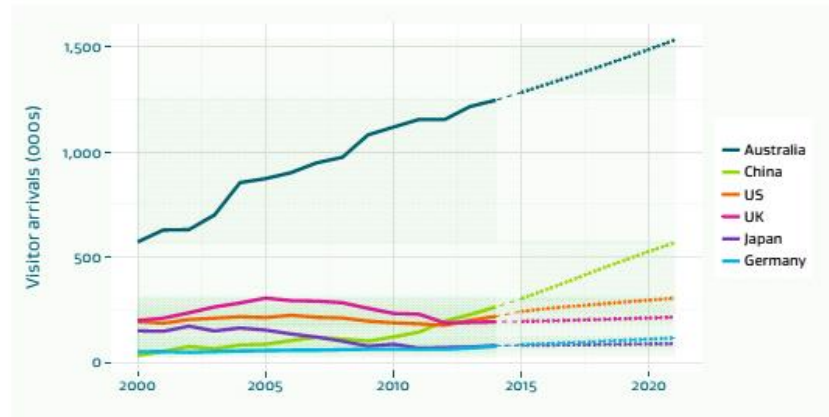
²⁵http://www.stats.govt.nz/Census/2013-census/profile-and-summary-reports/quickstats-about-a-place.aspx?request_value=15000&tabname=

²⁶<http://www.nzta.govt.nz/assets/resources/motor-vehicle-registration-statistics/docs/2008.pdf>

²⁷<http://www.nzta.govt.nz/assets/resources/motor-vehicle-registration-statistics/docs/2013.pdf>

67. Hence now that visitor arrivals to New Zealand are increasing the number rental vehicles arriving in the Queenstown Lakes District can be expected to continue to increase significantly. Especially because much of the burgeoning Chinese visitor market are now not travelling entirely by coach but are rapidly switching to travelling independently (FIT) in rental vehicles²⁸.

Figure 3: In terms of volume, Australia is projected to continue being New Zealand's largest market



Source: Statistics New Zealand, NZIER

Figure 4²⁹

68. The impact on the District of an increasing rental car fleet especially campervans is manifold:
- Road congestion and road safety issues;
 - Enlarging or more numerous laybys, and picnic areas;
 - Rising demand for carparking especially in the town centres and in association the departure points for tourist activities;
 - The need for satellite carparks and public transport to reduce congestion in town centres
 - Increasing demand for waste disposal facilities;
 - Requirement for more campervan or holiday parks; and
 - Proliferation of %freedom Camping+ and all its contingent problems.
69. Nevertheless without the burgeoning campervan market the region would not be able to sustain the current tourism growth because there is insufficient %bricks and mortar+ visitor accommodation in the District at present to meet the current visitor demand especially during peak periods such as Chinese New Year.

²⁸ "The market is undergoing a shift towards Free Independent Travellers (FIT) as Chinese become more confident about organising their own trips and seek fresh, unique experiences. Of the 215,040 holiday visitors in the year ending February 2015, some 73,000 were FIT (up 60 per cent on the previous year) while 144,000 were group (up 8 per cent). Independent travellers go to more regions and stay for longer. The average length of stay for a Chinese visitor is eight days" (<http://www.tourismnewzealand.com/markets-stats/markets/china/market-trends/>)

²⁹ <http://www.mbie.govt.nz/info-services/sectors-industries/tourism/tourism-research-data/commercial-accommodation-monitor/current-month-rto-reports/south-island-regional-reports/queenstown.pdf>

70. With respect to the roading network the QLDC Economic Development Strategy notes:

“Queenstown Lakes is very reliant on a few main road routes, particularly State Highway (SH) 6, that connects Queenstown to Frankton, Jack’s Point, Lake Hayes, Cromwell and Wanaka. SH6 north through the Kawarau Gorge is vulnerable to slips in winter. A key bottleneck is the single lane Kawarau Falls Bridge, that can result in long traffic queues at certain times and also restricts the use of heavier trucks for freight. This is also a connectivity risk for the District as, in the event of any major disruption at the Bridge or SH6 south, the only alternative access to the south involves a detour of 380km. SH6 between Queenstown and Frankton (Frankton Road) experiences peak hour congestion, with traffic predicted to slow to about 20 km/h in 20 years without remedial measures.”³⁰

71. I understand from discussions with Real Journeys staff that the traffic congestion in the Queenstown Town Centre results in significant costs for its business. For example: for day trips to Milford Sound and Doubtful Sound ex Queenstown Real Journeys can no longer pick up or drop off its passengers from Queenstown visitor accommodation with its coaches. To address this it engages Taxis to undertake this service at a significant cost to the company.
72. In my opinion the PDP Strategic Direction chapter should include provisions to address the shortcomings of the District’s transport system to ensure the District’s main industry, tourism is not hampered and saddled with additional costs; including policies around using the waterways for public transport to reduce road congestion. The same applies to visitor accommodation; at present the PDP Strategic Direction only addresses housing supply and ignores the need to provide for additional visitor accommodation including holiday parks for campervans.
73. The likely need for further visitor accommodation is supported by the data from the Commercial Accommodation Monitor (CAM) despite the response rate of commercial accommodation providers.

³⁰<http://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/District-Plan-Review-2015-s32-Links/Attachment-1-Insight-Economics-Queenstown-Visitor-Accommodation-Projections-Letter-080415-1.pdf>

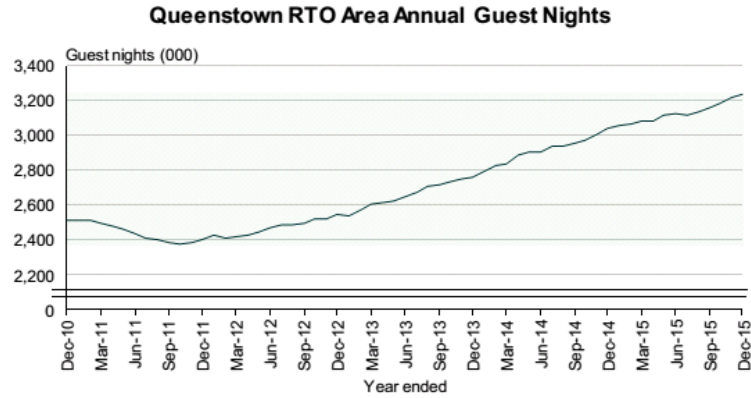


Figure 5³¹

- 74. The future likely accommodation capacity requirements are acknowledged in the Insight Economics April 2015 Report on Queenstown Visitor Accommodation Projections prepared to inform this PDP review. However the Strategic Direction chapter does not address the future visitor accommodation shortfall identified in the report.
- 75. I observe that Mr Colegrave contends there will be a lower demand for Holiday Parks and Backpackers compared to Hotels. However, these findings appear to be at odds with the annual growth of guest nights experienced by the Holiday Parks and Backpackers sectors as whole in recent years (refer image below). It also does not align with my own experience as a local planning consultant. Specifically, my colleagues and I are aware of multiple development proposals relating to new backpacker accommodation in Queenstown (in addition to some new motel proposals).

Commercial Accommodation ⁴ Year ended March 2014		
Guest Nights by Accommodation Type		Annual Growth
Hotel	11,601,131	6%
Motel	10,737,174	4%
Backpacker	4,498,826	8%
Holiday Park	6,289,676	-1%
Total	33,126,807	4%

Figure 6³²

³¹<http://www.holidayparks.co.nz/picshotel/hapnz2011/brochure/holiday%20parks%20-%20quick%20facts%202013.pdf>

³²<http://www.holidayparks.co.nz/PicsHotel/HAPNZ/Brochure/Annual%20Report%202014.pdf>

Commercial Accommodation ⁴		Year ended March 2015
Guest Nights by Accommodation Type		Annual Growth
Hotel	12,416,490	7%
Motel	11,167,887	4%
Backpacker	4,839,882	8%
Holiday Park	6,792,486	8%
Total	35,216,738	6%

Figure 7³³

76. I believe it is not practical the visitor industry to focus all its development in town centres. Rather, it is more appropriate that some satellite visitor accommodation occur away from the town centres (as has occurred with resort developments like Millbrook, Kawarau Village and Cardrona). In my opinion it would be appropriate for the PDP to identify areas for additional visitor accommodation, just as the PDP does for housing.

Policy 3.2.1.1.3

77. Mr Paetz is recommending Policy 3.2.1.1.3 be amended as follows:

3.2.1.1.3 Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services within the Queenstown and Wanaka ~~central business areas~~ town centres.

78. While the PDP seeks to ensure the Queenstown and Wanaka town centres remain vibrant, the current focus of bringing visitors into the centre of Queenstown to check-in for a trip where visitors are then taken out of the town centre is unlikely to be sustainable as visitor numbers continue to grow. In this regard I consider policy 3.2.1.1.3 (as notified and as attached to Mr Paetz's s42A Report) to be impractical, reasonably short sighted and unnecessary, at least in relation to Queenstown where there are significant issues for tourism operators with traffic congestion and pressure on infrastructure.
79. In my opinion the tourism sector is so strong and vibrant that the PDP emphasis on prescribing growth in the visitor industry to be located within the town centres is not necessary and unnecessarily interferes with the tourism market. I consider it is more appropriate to allow the market to determine where tourism related businesses should be located.

Objective 3.2.1.6

80. Mr Paetz is recommending Objective 3.2.1.6 be amended as follows:

3.2.1.6 Objective - Recognise the potential for rural areas to diversify their land use beyond the **strong productive value of farming, provided ~~a sensitive approach is taken to~~ adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated. (bold my emphasis)**

³³<http://www.holidayparks.co.nz/PicsHotel/HAPNZ/Brochure/HAPNZ%20Annual%20Report%202015.pdf>

81. Having reviewed the relevant s42A reports, including s32 evaluations and supporting economic evidence, I am unable to find any evidence to suggest that the district's farming sector has a strong productive value, especially compared to the Tourism Industry.
82. In 2013 Otago Economic Overview Berl found that:

“The Primary production sector is a relatively small part of the Queenstown Lakes, accounting for a little more than 3 percent of the district's employment and GDP. The sector had a good year in 2013, but it has declined over the longer-term.

Table 6.10 shows the recent and longer-term contribution of the Primary production sector GDP to the Queenstown Lakes economy. GDP in the sector jumped in 2013, owing to a good year for the Agriculture industry, but it has fallen slowly over the longer-term. Between 2003 and 2013, GDP in the sector decreased by 6.3 percent and GDP in Agriculture decreased by 11.1 percent.³⁴

Table 6.10 Primary Production GDP, Queenstown Lakes District, 2003 - 2013

Primary production sector GDP (2013\$m)	Year ending March				%pa change	
	2003	2011	2012	2013	2012 to 2013	2003 to 2013
Agriculture	36	27	35	40	16.0	1.1
Aquaculture	0	0	0	0	na	na
Services to Agriculture; Hunting and Trapping	5	5	4	4	-4.3	-1.6
Forestry and Logging	0	0	0	0	na	na
Mining and services to mining	7	2	1	0	-29.3	-23.2
Primary production sector	48	34	40	45	13.1	-0.6
Total GDP: Queenstown n-Lakes	865	1,187	1,258	1,321	5.1	4.3

Source: BERL Regional Database 2013

Figure 8

83. Compare this with the equivalent tourism related data where a little more than one fifth of the District's GDP is accounted for by this sector.

Table 6.7 Tourism GDP, Queenstown Lakes District, 2003 - 2013

Tourism GDP (2013\$m)	Years ending March				%pa change	
	2003	2011	2012	2013	2012 to 2013	2003 to 2013
Tourism-characteristic industries	145	193	209	214	2.4	3.9
Tourism-related industries	19	29	32	34	7.8	6.3
All non-tourism-related industries	13	20	20	22	13.4	5.6
Tourism Sector	177	242	260	270	3.9	4.3
Total GDP: Queenstown n-Lakes	865	1,195	1,259	1,321	5.0	4.3

Source: BERL Regional Database 2013

Figure 9

84. The PDP does not identify the location of farmland. In terms of land holdings:
- A large proportion of the district is administered by the Department of Conservation as part of the national conservation estate and is generally inappropriate for significant primary production activities;

³⁴ <http://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/District-Plan-Review-Rural/6.b.i-Landscape-Classification-Report-Wakatipu-PR.pdf>

- b. About 8% of the district is covered by lakes and urban areas;
 - c. The remaining land is available for primary production. The majority of this land is located within an ONFL and I assume is steep marginal farmland.
85. In my experience primary production activities devalue the naturalness of ONFLs more often than not because of the removal of indigenous vegetation and modification to the land cover. Therefore, if the natural character or quality of ONFLs are to be protected (in accordance with other strategic Objectives) then this appears to be at odds with maintaining a strong productive value of farmland.
86. In my opinion the above evidence suggests that tourism has a strong productive value to the district. On the contrary, I cannot find evidence to support the statement that the district has a strong productive value of farmland, as asserted in Objective 3.2.1.6.

Objective 3.2.1.7

87. Mr Paetz is recommending Objective 3.2.1.7 be amended as follows:
- Objective 3.2.1.7 - Maintain and promote the efficient and effective operation, maintenance, development and upgrading of the District's infrastructure, including designated Airports, key roading and communication technology networks.***
88. Mr Paetz is recommending the following new policy be inserted in relation to Objective 3.2.1.7:
- Safeguard the efficient and effective operation of regionally significant infrastructure from new incompatible activities.***
89. Mr Paetz is also recommending inclusion of a definition for regionally significant infrastructure in the PDP:
- Regionally significant infrastructure***
- Means:***
- a) Renewable electricity generation facilities, where they supply the National Grid and local distribution network and are operated by a electricity operator; and***
- b) Electricity transmission infrastructure; and***
- c) Telecommunication and radio communication facilities; and***
- d) Roads classified as being of national or regional importance; and***
- e) Designated airports.***
90. In my opinion it is appropriate to include these provisions in the district plan. However, the above provisions do not capture tourism infrastructure. I consider much of the districts tourism infrastructure is significant to the district and the region, particularly transport infrastructure (land, air, water based) which is necessary to transport visitors to, from and within the district. The definition currently excludes infrastructure associated with water transport. I believe this is

not satisfactory given the potential linkages between the town centres located around the edges of Lake Wakatipu and opportunities to reduce road congestion, especially between Frankton, Kelvin Heights and the Queenstown Town Centre.

91. I therefore believe it is appropriate that tourism infrastructure be included within this definition or otherwise provided for in the district plan in the same way that regionally significant infrastructure is provided for.
92. I observe that the RPS and the PRPS do not define the term regionally significant infrastructure.

Objective 3.2.4.4

93. Mr Paetz is recommending Objective 3.2.4.4 be amended as follows:

Objective 3.2.4.4 - Avoid the spread of wilding exotic vegetation ~~with the potential to spread and naturalise.~~ to protect nature conservation values and landscape values

94. I support this amendment but consider that the protection of the district's nature conservation and landscape values will be more appropriately achieved by inserting the term *indigenous* before *nature conservation values*, as follows:

Objective 3.2.4.4 - Avoid the spread of wilding exotic vegetation ~~with the potential to spread and naturalise.~~ to protect indigenous nature conservation values.

95. I consider this additional amendment appropriate in order to help maintain the quality of the district's ONFLs, which are recognised as an important contributor to the district's nature conservation based tourism activities.

Policy 3.2.4.4.1

96. Mr Paetz is recommending Policy 3.2.4.4.1 be amended as follows:

Policy 3.2.4.4.1 ~~That Prohibit the planting of identified exotic vegetation with the potential to spread and naturalise is banned~~

97. In my opinion this policy is reasonably directive and not of a sufficiently high enough level to warrant recognition in the strategic directions chapter. I consider it is more appropriately located in the district wide or rural zone chapters.

Objective 3.2.5.1

98. Mr Paetz is recommending Objective 3.2.5.1 be amended as follows:

Objective 3.2.5.1 - Protect the ~~natural character~~ quality of the Outstanding Natural Landscapes and Outstanding Natural Features from subdivision, use and development.

99. I consider the term *quality* to be problematic because there is a lack of policy guidance directing how the term should be interpreted. In my opinion *natural character* is a known quality.

100. I disagree with Mr Paetz's position that the objective should not include the term ~~'appropriate'~~. Section 6(b) explicitly seeks to ensure that ONFLs are protected from inappropriate subdivision use and development. I see no justification for leaving this important qualifier out of Objective 3.2.5.1. I consider doing so would:
- Be inconsistent with Section 6(b);
 - Serve no benefit;
 - Require plan administrators to refer back to section 6(b) in order properly interpret the objective (on the basis that the intent of 6(b) is inherent in the meaning of the objective); and
 - Entice further debate about the meaning and appropriateness of the provision thus resulting in unnecessary costs in the administration of the district plan.

Objective 3.2.5.2

101. Mr Paetz is recommending Objective 3.2.5.2 be amended as follows:

Objective 3.2.5.2 — Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes. Maintain and enhance the landscape character of the Rural Landscape Classification, whilst acknowledging the potential for managed and low impact change.

102. I support the deletion of the direction to ~~'minimise'~~ adverse landscape effects, as I consider the term ~~'minimise'~~ to be fraught with interpretation. For example, it is not clear whether the objective (as notified) was seeking to ensure subdivision, use or development had ~~'minimal'~~ adverse landscape effects or whether it was simply seeking adverse landscape effects to be reduced by applicants as far as practical.
103. However, in my opinion the objective, as amended above, does not make sense. It currently seeks to maintain and enhance a landscape classification system, not the land or a landscape value. The objective also introduces another term ~~'landscape character'~~ which is not defined in the Act, the RPS or PRPS, or the PDP. Without a clear definition or policy guidance reference to ~~'landscape character'~~ I consider the objective (and related policies) will be subjected to varying interpretations, which will increase costs associated with the administration of the PDP.
104. Having regard to section 7(c) (which seeks to maintain and enhance amenity values) coupled with the definition of amenity values specified in the Act (which includes ~~'those natural or physical qualities and characteristics of an area'~~), I consider it is more appropriate for the objective to seek to provide for subdivision, use and development of the rural environment where amenity values are maintained and enhanced. I also consider the objective could be re-worded in a more positive style, as follows:

~~**Objective 3.2.5.2 – Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes. Maintain and enhance the landscape character of the Rural Landscape Classification, whilst acknowledging the potential for managed and low impact change. Subdivision, use and development of the rural environment occurs in a way that maintains or enhances rural amenity values.**~~

Objective 3.2.5.4

105. Mr Paetz is recommending Objective 3.2.5.4 be adopted as notified:

Objective 3.2.5.4 - Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscape are to be maintained.

106. Similarly to my comments in relation to Objective 3.2.5.1 above, it is not clear what %qualities+ are to be maintained. In my opinion more specific policy guidance should be provided to enable this objective to be effectively applied in practice. An alternative I support is to replace %qualities+ with %characteristics+, assuming the %characteristics+ are articulate in supporting policies or methods. I recommend amending the objective as follows:

Objective 3.2.5.4 - Recognise there is a finite capacity for residential activity in rural areas if the characteristics qualities of our landscape are to be maintained.

107. If the objective is retained, I recommend it be supported by a policy and/or method that clarifies what characteristics are threatened by residential activity.

Objective 3.2.5.5 & Policies 3.2.5.5.1 and 3.2.5.5.2

108. Mr Paetz is recommending Objective 3.2.5.5 and Polices 3.2.5.5.1 and 3.2.5.5.2 be retained as notified:

Objective 3.2.5.5 - Recognise that agricultural land use is fundamental to the character of our landscapes.

Policy 3.2.5.5.1 - Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.

Policy 3.2.5.5.2 - Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.

109. I do not support the retention of these provisions and I recommend they be deleted. The provisions inappropriately seek to:
- a. preserve agricultural activities over and above more appropriate activities (for example eco-tourism, nature conservation, and outdoor recreation activities);

- b. preserve the character of modified landscape characteristics over and above activities that could improve/restore indigenous biodiversity and natural character values.
110. The following statement in a report prepared by the Department of Conservation summarises the early history of high-country pastoralism in the south island³⁵:

At first, much of the land was forest-covered; extensive grasslands existed only in the dry basins of Central Otago and the Mackenzie Country. With the exception of moa, grazing and browsing animals were absent. With the arrival of Polynesians, who hunted and gathered food and extracted stone from the high country, and later European graziers, forests were fired, and almost the entire high country was transformed into tussock grasslands and dry scrub. Maori ownership and association with the land gradually declined. Europeans introduced grazing and browsing animals and also, as the natural grasslands became depleted, exotic plant species to improve pasture. Wool was the main product. Animal pests, such as rabbits, pigs and goats, and unwanted plants, such as broom and sweet briar, invaded. Animal diseases, especially scab, spread rapidly. The pastoral industry was challenged for a brief period by the gold-mining industry. Land fertility and stock numbers declined, and from the late 19th century the State intervened increasingly, employing scientific methods in an effort to resolve these problems. By the early 20th century, the mining industry had waned and tourism and hydroelectricity production were becoming more important. Many high-country slopes had eroded.

111. In other words, due to agricultural use the district's landscape environment has been significantly modified in a relatively short time, with considerable loss of indigenous diversity and natural character. This in my opinion does not accord with the thrust of Part 2 of the Act and does warrant enshrining such environmental change in the District Plan. Unlike the significant natural values that are required to be given particular regard as a matter of national importance, there is no matter in Part 2 of the Act that seeks to protect agricultural land use in terms of its contribution to landscapes. The only link to Part 2 is the relationship with section 7(c) and 7 (f) in terms of maintaining and enhancing amenity values and the quality of the environment.
112. [Related to this is the emphasis in the values section of Chapter 6 on terrestrial landscapes, not the District waterways, which I think supports the need for a separate water chapter discussed in my evidence above.]
113. The values description in Chapter 6 includes the following statement:
- The open character of productive farmland is a key element of the landscape character which can be vulnerable to degradation from subdivision, development*

³⁵ <http://www.doc.govt.nz/Documents/science-and-technical/sap240entire.pdf>

and non-farming activities. The prevalence of large farms and landholdings contributes to the open space and rural working character of the landscape. The predominance of open space over housing and related domestic elements is a strong determinant of the character of the District's rural landscapes.

114. I consider the above statement to be misguided. My understanding is that the productive farmland in the district is lowland farms involved with horticulture, viticulture and dairy. The high country stations have relatively low stocking ratios and have a much lower productivity compared to low land farms.

High country is characterised by hilly terrain and low pasture production, especially during the cold winter months, and is used predominantly for sheep farming based on fine wool production. Flat to rolling country usually has good all-year-round pasture production and supports almost all of New Zealand's dairy cattle in addition to large numbers of sheep and beef cattle.³⁶

115. I consider high country farms to be more vulnerable to erosion and threats from pest and weed species than development not non-farming activities. In many cases it is non-farming activities such as tourism which provide additional income for these farmers:

A large proportion of our single largest industry and overseas income earner, tourism, is based in the high country. Nearly a quarter of all tourist bed nights in New Zealand are spent in the high country, generating an estimated \$4 billion in tourism revenue. By comparison high country farm gate revenue in 2005 was \$113 million³⁷.

116. Generally, I believe the PDP inappropriately focuses on agricultural land use and the protection of this activity and protection of its related landscape character is misguided. I am of the opinion that it is the New Zealand's scenery which attracts the bulk of visitors to the district, not farming. In my opinion there is the significant potential to restore the modified landscapes (which I consider to be degraded natural environments) and recreate more uniquely New Zealand environments. I anticipate this would be more attractive for the visitor industry and therefore leverage more tourism growth which provides much more GDP for the District than agriculture. In my opinion farming should not be given any preference in the district over any above activities that may result in environmental benefits such as those that enable people to enjoy the outdoor environment and support the restoration of natural conservation values. This position would appear to support the following position of Mr Colegrave and also policy 6.3.7.1 as discussed in Mr Barr's s42A Report:

"Given that the district relies heavily on the tourism sector and the quality of the natural environment, it is my opinion that it will be of vital importance to the local economy that

³⁶1. https://www.landcareresearch.co.nz/_data/assets/pdf_file/0020/77033/1_5_Morris.pdf

³⁷ <http://www.forestandbird.org.nz/files/file/HighCountry.pdf>

growth in population and tourism nights is appropriately and sustainably provided for.³⁸

...[policy 6.3.7.1] is intended to encourage the consideration of compensatory measures associated with subdivision and development proposals. The policy also encourages a wider consideration of the use of land and future land use associated with subdivision and development, and requires consideration of the potential to recognise, protect or regenerate indigenous biodiversity where the land use is likely change from a focus on rural production to rural living or a commercial tourism basis.³⁹

117. In respect of Objective 6.3.8 and related policies I support the attempt described by Mr Barr (par 9.187) to acknowledge the importance of tourism to the District, that tourism is dependent on the quality of the landscape, the dependence of tourism on landscapes and that some tourism and commercial recreation activities, by necessity, will require locating within environments that are valued as matters of national importance in terms of s6(a), (b), and (e) of the RMA, and can be vulnerable to degradation
118. For the reasons provided above in relation to tourism activities, the reasons provided in the submission by Queenstown Park Limited (QPL), and to support the new tourism related objective being recommended for inclusion in Chapter 3 by Mr Paetz (in relation to the relief sought by Real Journeys), I support the relief sought by QPL. Specifically, I consider it is more appropriate for policy 6.3.8.1 to recognise and provide for the important role tourism rather than simply acknowledging it.

Policy 6.3.1.8

119. Mr Barr has recommended Policy 6.3.1.8 be amended as follows:

Policy 6.3.1.8 Ensure that the location and direction of lights does not cause glare to other properties, roads, and public places or avoids degradation of the night sky, landscape character and sense of remoteness where it is an important part of that character.

120. In his discussion Mr Barr recommends rejecting the relief sought by Real Journeys to exclude marine navigation light/glare from this policy.
121. In my opinion the recommended amendment changes the meaning of this policy (as notified) and ignores Real Journeys concern. Extreme light spill makes it very difficult to navigate vessels on Lake Wakatipu in the dark. Navigation at night requires good night vision to pick out navigation marker lights and the navigation lights on other vessels. I consider the waterways of the district need to be protected from undue glare to ensure vessel navigation is not compromised further.

³⁸ (underlined my emphasis). (par 6.4 in evidence of Mr Colegrave)

³⁹ Par 9.178. s42A Report for Chapter 6

RURAL LIVING IN THE WAKATIPU BASIN

Rural general zone - discretionary approach with no minimum lot sizes

122. I generally support the approach set out in the ODP and the PDP of applying a discretionary activity status to subdivision and residential development on Rural General zoned land without minimum lot sizes. In this regard I agree with Mr Barr (par 6.4-6.5) that it is appropriate to avoid using minimum lot sizes for subdivision. While this creates uncertainty for landowners and district plan administrators, in my experience it is an effective method for incentivising a design led approach to the layout of new allotments, location and appearance of buildings and driveways, and landscape treatment. This approach is appropriate within sensitive receiving environments, such as the existing Rural General Zoned land in the Wakatipu Basin, because it facilitates a design led approach to subdivision and development while ensuring that actual and potential positive effects (enhancement opportunities) can be identified and adverse effects on the sensitive receiving environment can be avoided, remedied, or mitigated.
123. The alternative (providing minimum lot sizes), has an impractical and fundamental issue of attempting to predict what an appropriate minimum lot size having regard to the receiving environment. In my experience this is not practical unless a fine grained master plan is undertaken across the subject rural area. If a minimum lot size is selected, it runs the risk of:
- a. Being too small, which could lead to inappropriate adverse effects associated with ad hoc development sprawl;
 - b. Being too large, which could prevent appropriate development from being realised and/or impose unnecessary high costs on land development
124. Notwithstanding the above I support a minimum lot size where an assessment has been carried out identifying that a minimum lot size for subdivision can be applied without significantly adversely affecting landscape and amenity values (such as in land zoned rural residential and rural lifestyle).

Protection of rural character/maintenance and enhancement of amenity values and the quality of the environment/enabling rural living in the Wakatipu Basin

125. Having reviewed the evidence of Mr Baxter, based on my own appreciation of the Wakatipu Basin, and having spoken with numerous landowners and people familiar with land use in the basin, I am of the firm view that in respect of the Wakatipu Basin the PDP (Objective 3.2.5 and Policies 3.2.5.5.1 and 3.2.5.5.2 and all of Chapter 6:
- a. Overstate and give inappropriate weight to the protection of primary production activities and rural character;
 - b. Do not take satisfactorily account of the rural living characteristics present in the Wakatipu Basin;
 - c. Do not satisfactorily recognise and provide for new rural living opportunities.

126. I estimate the RLC land within the Wakatipu Basin comprises about 65km² or 1% of the district⁴⁰. Unlike the majority of land holdings in the Rural General Zone (ODP and PDP) the Wakatipu Basin does not contain large rural land holdings as are typical of the numerous farm stations located throughout the district.
127. As highlighted in the evidence of Mr Baxter the Wakatipu Basin is characterised by rural living developments (among other things).
128. This position appears to be supported in Mr Barr's s42A Report which recognises the difference characteristics of the Wakatipu Basin:

A case in point here is the difference in character between parts of the Wakatipu Basin compared to the Wanaka and Hawea Basins, Luggate and parts of the Crown Terrace. These areas are for the most part typically categorised as being a visual amenity landscape but do not exhibit the characteristics of an 'arcadian' or 'pastoral in the poetic sense' visual amenity landscape. Instead they have a rural working character and are characterised by productive farming, linear shelterbelts and an absence of residential housing. (par 6.6, 4th bullet point).

...It has been identified that the VAL and ORL planning frameworks are not the most appropriate way to manage the landscape resource and the entire policy framework and assessment matters in part 21.7 have been modified to reflect that the landscape quality should not be based on the terms of an 'arcadian or pastoral in the poetic sense' landscape. I also refer to Dr Read's evidence (see Section 5.6) where her view is that that the qualities that characterise the VAL were developed with reference to the Wakatipu Basin, and fail to value the characteristics of other locations such as the Upper Clutha landscape. (par 9.9).

129. Despite this recognition there appears to be reluctance in the s42A Report to recognise the rural living characteristics of the Wakatipu Basin. Paragraph 9.105 reinforces this point by ignoring rural living characteristics and instead referring only to the pastoral, rural working landscapes in the functional sense:

...The PDP policies do not predetermine the maintenance of a type of landscape, but aim to recognise the value of all landscapes including pastoral, rural working landscapes in the functional sense.

130. I generally agree with the commentary in paragraphs 9.38-9.53 as it relates to parts of the district dominated by rural character. However, I think it is misguided to apply the discussion in paragraphs 9.38-9.53 to the management of the Wakatipu Basin. As identified in the concluding comments in the landscape evidence prepared by Mr Baxter it is reasonable to anticipate that there will be a shift in the balance towards a predominantly rural living character, far removed

⁴⁰ Based on a very cursory attempt at measuring the area using QLDC's online GIS mapping tools

from the characteristics described by Dr Read in her description of the current condition. I firmly agree with Mr Baxter's concluding commentary that:

Some people do and will view the change described above negatively, as Dr Read obviously does, primarily because of the loss of rural character. Others do and will view it positively, primarily because the rural living characteristics create a more varied and interesting pattern and because many people actually like driving through the countryside and looking at other people's houses. I consider the key point to be the predominance of amenity tree planting which I have described above. Over time that will enhance the existing significantly treed aesthetic which I consider to be a pleasant and enjoyable aesthetic with a high degree of visual amenity, provided development is carried out under the stringent landscaping controls which have been consistently applied over the past 15-20 years in the Basin.

131. I generally support the approach to managing landscape characteristics throughout the majority of the district's rural zone. However, to improve plan administration and enable more appropriate management of the effects of subdivision, use and development on the landscape, I consider:
- a. The specific landscape characteristics being referred to in the landscape provisions should be identified in the district plan with specific guidance and recognition provided in the policy framework;
 - b. The Wakatipu Basin should not be subjected to the rural landscape provisions provided in the PDP (at least as notified or amended by Mr Barr). Rather, the Wakatipu Basin should be provided with its own finer grained policy framework and assessment criteria, which emphasises that rural living opportunities should be enabled while maintaining or enhancing amenity values. not protecting rural characteristics.
132. In respect of the landscape values of the Wakatipu Basin I disagree with Mr Barr (par 9.11) that:
- ...the PDP Landscape objectives and provisions are more effective at recognising and managing the values derived from rural character, in that they are different from 'amenity values'. The matter of recognising the finite capacity of rural areas to absorb development and to sustain the quality and character, and amenity of the District's landscapes is also better acknowledged in the PDP provisions.*
133. Like the ODP, the PDP seeks to preserve rural characteristics and avoid adverse cumulative effects. I consider this is not appropriate when a fundamental intent of the purpose of the Act is to enable people to use and develop their land provided adverse effects are avoided, remedied or mitigated (my opinion). I am not aware of any evidence identifying the benefits of protecting the farming productivity of land within the Wakatipu Basin or the contribution farming activities

in the Wakatipu Basin make to the local economy. Based on the statistics I have provided above, I assume that it is a very little to indiscernible contribution. On the contrary, I assume that rural living makes as significant contribution to the local economy, in the form of:

- a. Revenue and local spend from relatively high property transactions;
 - b. Construction and landscaping expenditures which flows through the economy and provides employment for many tradespeople
 - c. Local spend from more residents;
 - d. Relatively high rating income; and
 - e. Ongoing employment opportunities for low . mid income wage earners (e.g. cleaners, landscapers, maintenance contractors).
134. I also consider rural living can significantly improve the quality of the environment, more so that farming activities. For example, owners of rural living properties in the Wakatipu Basin tend to be able to take care of their land in a comprehensive and designed manner to a high standard. The planning regime is such that much of the land in the Wakatipu Basin used for rural living is managed in accordance with purposefully design landscape plans. In this context I consider, a large proportion of the Wakatipu Basin is a managed environment.
135. In terms of the RLC within the Wakatipu Basin the Act only seeks to ensure that amenity values associated with the landscape are maintained and enhanced (7(c)) and that resources are used effectively and efficiently (7(b)) Outside ONFLs I consider there is no justification for preventing subdivision and development that is carefully managed to ensure amenity values are maintained or enhanced. Locking up highly valuable land that does not carry significant primary production values or contribute a significant environmental value to the district wide community does not, in my opinion, align with the purpose of the Act. I am of the opinion that a development that provides new tailored housing and landscape treatment that contributes to the rural living characteristics of the basin should be encouraged, not discouraged.
136. In my opinion the references to cumulative adverse effects in the ODP and the PDP are unhelpful in terms of achieving sustainable management. Any and all new development has a cumulative effect and such effects on amenity values could be considered adverse by one person and positive by another (as is the subjective nature of amenity values). In this regard I appreciate why the PDP introduces policy tact to shift away from the protection of amenity values to the protection of landscape characteristics . the cumulative effects on landscape characteristics will be more definable and measurable compared to cumulative effects on amenity values (acknowledging that this approach still requires subjective interpretations and analysis from individual landscape architects).
137. In response to submissions regarding subdivision and development in the Wakatipu Basin Mr Barr (pars 9.21 and 9.22) states:

9.21 Submitter 456 (Hogans Gully Farming Ltd) seeks that subdivision and development should be allowed in the Rural Landscapes on the basis that it does not 'significantly adversely affect' the landscape quality or character, as opposed to 'degrade' as proposed in Policy 6.3.5.1. I consider that accepting these changes would weaken the provisions to protect the landscape resource and are not supported.

138. In my opinion Mr has not substantiated how the proposed changes would weaken the provisions to protect the landscape resource (in relation to the Wakatipu Basin).
139. Similarly, Mr Barr (pars 9.112-114) states:

Submitter 624 (D & M Columb) requests that Policy 6.3.2.5 requests the following amendments:

Ensure incremental changes from subdivision and development do not degrade the overall quality of the district's significant landscape values, character or openness as a result of activities associated with mitigation of the visual effects of proposed development such as screening planting, mounding and earthworks

The requested changes are not considered more appropriate because the phrase 'overall quality' and 'significant' introduces vagueness and weakens the ability for cumulative effects to be recognised. The requested changes also remove the focus of the policy which is to consider the cumulative impacts of screening and mitigation could have.

In summary, it is considered important that the issue of cumulative effects are recognised and given priority for decision makers. I don't consider that the submissions have provided a better case or applied any evidential basis that cumulative effects should be managed in another way, particularly in the context of the planning regime for the Rural Zone of the District. In addition, the submission points received on the cumulative effects objective and policy do not convince me that they are not appropriate or that there is a more suitable alternative. It is therefore recommended the objective and polices are retained as notified.

140. Any new subdivision and development within the Wakatipu Basin will contribute a cumulative effect to some extent, but given the sensitivity of the Wakatipu Basin landscape (in that it is recognised as a locally significant VAL landscape under the ODP) I consider the wording proposed by Hogans Gully Farming Ltd to be appropriate on the basis that:
- a. Any subdivision or development that is not carefully and comprehensively designed or maintained is likely to significantly adverse affect the landscape quality or character.

- b. Any subdivision or development that is carefully and comprehensively designed and maintained is not likely to significantly adversely affect the broader landscape quality or character of the Wakatipu Basin.
- c. The matter is a local issue and there are no matters of national importance or regional significance to be concerned with. At a local level I envisage there will likely always be tensions between the desire of some people to preserve the appearance of their surrounding environment and others who support change. In accordance with the direction of Part 2 of the Act the focus of the management of adverse effects should be on maintaining and enhancing amenity values and the quality of the environment. Not protecting resources from people wanting to subdivide, use and develop resources, which I consider lies deep in the heart of the purpose of the Act and should prevail in this case.
141. I do not agree with the statement in par 9.134 of Mr Barr's s42A Report that Objective 6.3.5 is:
- Is balanced in that it contemplates change within rural areas, subject to the merits of the development proposals and the ability of the landscape to absorb development.*
142. In my opinion the objective, as notified, presents a substantial hurdle to pass as it effectively requires support from neighbouring parties to demonstrate that visual amenity values will not be diminished. Based on my experience and appreciation of the desire of some people to oppose change in their backyard (NIMBY), I consider it is a rare that all parties involved in a subdivision or development proposal in the Wakatipu Basin will agree that visual amenity values will not be diminished. Therefore, the objective as notified effectively discourages subdivision, use and development and I agree with the concerns raised about this objective and the relief sought in the submissions⁴¹.
143. I also agree with the concerns raised and the relief sought by these submitters in relation to policies 6.3.5.2 and 6.3.5.3. In relation to the Wakatipu Basin I consider planting and other types of landscape treatment (bunds) can assist in the maintenance and enhancement of amenity values of the area. While I agree this could lead to a loss of openness that may change or adversely affect existing landscape characteristics (in some situations), the significance of this effect does not warrant a policy direction that discourages this from occurring if it can be achieved with carefully design that can maintain or enhance amenity values. In my creating a policy framework that seeks to prevent people from planting along their own property for the benefit of others frustrates the intent of sustainable management . particularly where the planting and maintenance of trees and shelter belts is a strong rural characteristic and can provide practical functions such as shelter from wind, sun, provide privacy, and support or enhance natural conservation values.
144. For the above reasons I do not agree with Mr Barr (par 9.97) that it is appropriate for any objective or policy within the PDP, including policy

⁴¹ 513, 515, 528, 532, 535, 537

6.3.1.11, to focus on or seek to protect the landscape character of RLC land within the Wakatipu Basin. In terms of this land I consider it is more appropriate for the PDP to focus on maintaining and enhancing amenity values, so that the local landscape characteristics (which contribute to local amenity values) can be addressed on a case-by-case site specific basis.

145. Finally, I do not agree with the statement in paragraph 9.108 of Mr Barr's s42A Report that:

"It is inherent that development proposals which accord with the policy would fit within the description of the requested changes. Therefore, these amendments would not in my view offer added value from either a conservation, development or administration perspective".

146. I agree it will be inherent for experienced resource management practitioners. However, practically, this provision (like all provisions in the PDP) will be implemented by people who are not experienced RMA practitioners. Refraining from including explicit intentions of a policy weakens the policy and represents a missed opportunity to improve the effectiveness of the policy. Additionally, in my experience (working with QLDC consent staff on a daily basis) there is a real risk that the inherent reference within this provision will be lost on the rejuvenating young crop of district plan administrators. If the provision is to be retained (one way or another, I consider it is appropriate that any inherent references be made explicit in the policy).
147. Having regard to the above I do not agree with Mr Barr (par 9.23) that overall the landscape objectives and policies are appropriately balanced and adequately phrased. I recommend the following amendments to the rural landscape provisions in Chapter 6 (should they be retained one way or another).

CONCLUSION

148. I have been asked by various submitters to prepare planning evidence in relation to their respective interests in Chapters 3, 4, and 6 of the PDP. My evidence addresses their respective interests, having regard to my experience and role as a local planning practitioner working with the PDP on a daily basis. My evidence also addresses the relevant statutory framework.
149. Having regard to the matters raised in the evaluative material before you, including other submissions and the material contained in or supportive of the respective s42A reports, I consider:
- a. Chapter 3 should be retained subject to the amendments listed in Appendix 1 of my evidence (or other amendments with like effect);
 - b. Chapters 4 and 6 should be deleted but some provisions could be promoted to Chapter 3 or demoted to the lower order zone chapters.



Signed 29 February 2016

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

Key: Recommend changes to notified chapter are shown in underlined text for additions and ~~strike through text~~ for deletions.

3 Strategic Direction

3.1 Purpose

This chapter sets out the over-arching strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the Queenstown Lakes District's special qualities as set out in Goal 3.2.0:

This direction is provided through a set of Strategic Goals, Objectives and Policies which provide the direction for the more detailed provisions related to zones and specific topics contained elsewhere in the District Plan.

- ~~• Dramatic alpine landscapes free of inappropriate development~~
- ~~• Clean air and pristine water~~
- ~~• Vibrant and compact town centres~~
- ~~• Compact and connected settlements that encourage public transport, biking and walking~~
- ~~• Diverse, resilient, inclusive and connected communities~~
- ~~• A district providing a variety of lifestyle choices~~
- ~~• An innovative and diversifying economy based around a strong visitor industry~~
- ~~• A unique and distinctive heritage~~
- ~~• Distinctive Ngai Tahu values, rights and interests~~

~~This direction is provided through a set of Strategic Goals, Objectives and Policies which provide the direction for the more detailed provisions related to zones and specific topics contained elsewhere in the District Plan.~~

3.2 Goals, Objectives and Policies

Goal 3.2.0 – Maintain the district's special qualities, which are:

- Dramatic alpine landscapes free of inappropriate development
- Clean air and pristine water
- Vibrant and compact town centres
- Compact and connected settlements that encourage public transport, biking and walking
- Diverse, resilient, inclusive and connected communities
- A district providing a variety of lifestyle choices
- An innovative and diversifying economy based around a strong visitor industry
- A unique and distinctive heritage
- Distinctive Ngai Tahu values, rights and interests

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.1 Goal - Develop a prosperous, resilient and equitable economy.

3.2.1.1 **Objective** - Recognise, develop and sustain the Queenstown and Wanaka ~~central business areas~~ town centres as the hubs of New Zealand's premier alpine resorts and the District's economy.

Policies

3.2.1.1.1 Provide a planning framework for the Queenstown and Wanaka ~~central business areas~~ town centres that enables quality development and enhancement of the centres as the key commercial, civic and cultural hubs of the District, building on their existing functions and strengths.

3.2.1.1.2 Avoid commercial rezoning that could ~~fundamentally~~ undermine the role of the Queenstown and Wanaka ~~central business areas~~ town centres as the primary focus for the District's economic activity.

3.2.1.1.3 Promote growth in the visitor industry and encourage investment in lifting the scope and quality of attractions, facilities and services ~~within the Queenstown and Wanaka central business areas~~ town centres.

3.2.1.2 **Objective** – Recognise, develop, sustain and integrate the key mixed use function of the wider Frankton commercial area, comprising Remarkables Park, Queenstown Airport, and Five Mile.

Policies

3.2.1.2.1 Provide a planning framework for the wider Frankton commercial area that facilitates the integrated development of the various mixed use development nodes.

3.2.1.2.2 Recognise and provide for the varying complementary functions and characteristics of the various mixed use development nodes within the Frankton commercial area.

3.2.1.2.3 Avoid additional commercial rezoning that will undermine the function and viability of the Frankton commercial area, or which will undermine increasing integration between the nodes in the area.

3.2.1.3 **Objective** - Recognise, develop and sustain the key local service and employment functions served by commercial centres and industrial areas outside of the Queenstown and Wanaka ~~central business areas~~ town centres and Frankton.

Policies

3.2.1.3.1 Avoid commercial rezoning that would ~~fundamentally~~ undermine the key local service and employment function role that the ~~larger urban~~ centres outside Queenstown, and Wanaka ~~central business areas~~ and Frankton fulfil.

3.2.1.3.2 Reinforce and support the role that township commercial precincts and local shopping centres fulfil in serving local needs.

3.2.1.3.3 Avoid non-industrial activities not related to or supporting industrial activities occurring within areas zoned for Industrial activities.

3.2.1.4 **Objective** – Recognise and provide for the significant socioeconomic benefits of tourism activities across the District.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

Policies

~~3.2.1.4.1 Enable the use and development of natural and physical resources for tourism activity where adverse effects are avoided, remedied or mitigated.~~

~~3.2.1.4.2 Maintain and enhance the district's natural character;~~

~~3.2.1.4.3 Protect existing transport routes and access to key visitor attractions from incompatible uses and development of land and water;~~

~~3.2.1.4.4 Protect existing buildings, structures and informal airports that support tourism activities from incompatible land use or development;~~

~~3.2.1.4.5 Enable the use and development of natural and physical resources for tourism activity where adverse effects are avoided, remedied, or mitigated;~~

~~3.2.1.4.3.2.1.4.6 Recognise the contribution tourism infrastructure makes to the economic and recreational values of the District.~~

3.2.1.5 Objective - Enable the development of innovative and sustainable enterprises that contribute to diversification of the District's economic base and create employment opportunities.

Policies

3.2.1.5.1 Provide for a wide variety of activities and sufficient capacity within commercially zoned land to accommodate business growth and diversification.

3.2.1.5.2 Encourage economic activity to adapt to and recognise opportunities and risks associated with climate change and energy and fuel pressures.

3.2.1.6 Objective - Recognise the potential for rural areas to diversify their land use **beyond the strong productive value of farming**, provided a sensitive approach is taken to **adverse effects on rural amenity values**, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests **are avoided, remedied or mitigated.**

3.2.1.7 Objective - Maintain and promote the efficient **and effective operation, maintenance, development and upgrading** of the District's infrastructure, **including designated Airports, key roading and communication technology networks.**

Policies

3.2.1.7.1 Safeguard the efficient and effective operation of regionally significant infrastructure from new incompatible activities.

Comment [bf1]: Promoted from Chapter 6 (Policy 6.3.8.1)

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.2 Goal - The strategic and integrated management of urban growth

3.2.2.1 Objective - Ensure urban development occurs in a logical manner:

- to promote a compact, well designed and integrated urban form;
- to manage the cost of Council infrastructure; and
- to protect the District's rural landscapes from sporadic and sprawling development.

Policies

- 3.2.2.1.1 Apply Urban Growth Boundaries (UGBs) ~~around the urban areas~~ in the Wakatipu Basin (including Jack's Point), Arrowtown and Wanaka in accordance with Appendix 3.1.
- 3.2.2.1.2 Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs unless provided for via a plan change process.
- 3.2.2.1.3 Manage the form of urban development within the UGBs ensuring:
 - Connectivity and integration with existing urban development;
 - Sustainable provision of Council infrastructure; and
 - Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems
- 3.2.2.1.4 Encourage a higher density of residential development in locations close to town centres, local shopping zones, activity centres, public transport routes and non-vehicular trails.
- 3.2.2.1.5 Ensure UGBs contain sufficient suitably zoned land to provide for future growth and a diversity of housing choice.
- 3.2.2.1.6 Ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships, to reduce the incentive for land banking in order to address housing supply and affordability.
- 3.2.2.1.7 That further urban development of the District's small rural settlements be located within and immediately adjoining those settlements.

3.2.2.2 Objective - Manage development in areas affected by natural hazards.

Policies

- 3.2.2.2.1 Ensure a balanced approach between enabling higher density development within the District's scarce urban land resource and addressing the risks posed by natural hazards to life and property.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.3 Goal - A quality built environment taking into account the character of individual communities

3.2.3.1 Objective - Achieve a built environment that ensures our urban areas are desirable and safe places to live, work and play.

Policies

3.2.3.1.1 Ensure development responds to the character of its site, the street, open space and surrounding area, whilst acknowledging the necessity of increased densities and some change in character in certain locations.

3.2.3.1.2 That larger scale development is comprehensively designed with an integrated and sustainable approach to infrastructure, buildings, street, trail and open space design.

3.2.3.1.3 Promote energy and water efficiency opportunities, waste reduction and sustainable building and subdivision design.

3.2.3.2 Objective - Protect the District's cultural heritage values and ensure development is sympathetic to them.

Policies

3.2.3.2.1 Identify heritage items and ensure they are protected from inappropriate development.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.4 Goal - The protection of our natural environment and ecosystems

3.2.4.1 ~~Objective - Promote development and activities that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems. Ensure development and activities maintain indigenous biodiversity, and sustain or enhance the life-supporting capacity of air, water, soil and ecosystems.~~

3.2.4.2 **Objective** - Protect areas with significant Nature Conservation Values.

Policies

3.2.4.2.1 Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas on the District Plan maps and ensure their protection.

3.2.4.2.2 ~~Where adverse effects on nature conservation values cannot be avoided, remedied or mitigated, consider environmental compensation as an alternative.~~

3.2.4.3 **Objective** - Maintain or enhance the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities.

Policies

3.2.4.3.1 That development does not adversely affect the survival chances of rare, endangered, or vulnerable species of indigenous plant or animal communities

3.2.4.4 **Objective** - Avoid the spread of wilding exotic vegetation with the potential to spread and naturalise, to protect indigenous nature conservation values.

Policies

~~3.2.4.4.1 That Prohibit the planting of identified exotic vegetation with the potential to spread and naturalise is banned.~~

3.2.4.5 **Objective** - Preserve or enhance the natural character of the beds and margins of the District's lakes, rivers and wetlands.

Policies

3.2.4.5.1 That subdivision and / or development which may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins be carefully managed so that life-supporting capacity and natural character is maintained or enhanced.

3.2.4.6 **Objective** - Maintain or enhance the water quality and function of our lakes, rivers and wetlands.

Policies

3.2.4.6.1 That subdivision and / or development be designed so as to avoid adverse effects on the water quality of lakes, rivers and wetlands in the District.

3.2.4.7 **Objective** - Facilitate public access to the natural environment.

Policies

3.2.4.7.1 Opportunities to provide public access to the natural environment are sought at the time of plan change, subdivision or development.

3.2.4.8 **Objective** - Respond positively to Climate Change.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

Policies

- 3.2.4.8.1 Concentrate development within existing urban areas, promoting higher density development that is more energy efficient and supports public transport, to limit increases in greenhouse gas emissions in the District.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.5 Goal - Our distinctive landscapes are protected from inappropriate development.

3.2.5.1 Objective - Protect the natural character quality of ~~the~~ Outstanding Natural Landscapes and Outstanding Natural Features from inappropriate subdivision, use and development.

Policies

3.2.5.1.1 Identify the districts Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps, and protect them from the adverse effects of inappropriate subdivision and development.

3.2.5.2 Objective - Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes. ~~Maintain and enhance the landscape character of the Rural Landscape Classification, whilst acknowledging the potential for managed and low impact change. Subdivision, use and development of the rural environment occurs in a way that maintains or enhances rural amenity values.~~

Policies

3.2.5.2.1 Identify the districts Rural Landscape ~~Classification~~ on the district plan maps, and: ~~minimise the effects of subdivision, use and development on these landscapes~~

- i. ~~Recognise that the RL is a resource with significant economic and social value.~~
- ii. ~~Recognise that different parts of the RL have different characteristics, different amenity values and variable ability to absorb further development.~~
- iii. ~~Enable subdivision and development which avoids, remedies or mitigates adverse effects on the visual amenity values of the surrounding RL.~~
- iv. ~~Avoid or appropriately mitigate adverse effects from subdivision and development that are:~~
 - ~~Highly visible from public places and other places which are frequented by members of the public generally (except any trail as defined in this Plan); and~~
 - ~~Visible from public formed roads.~~
- v. ~~Avoid planting and screening, particularly along roads and boundaries, which would obstruct significant views or significant adversely affect visual amenity values.~~
- vi. ~~Encourage any landscaping to be sustainable and consistent with the established character of the area.~~
- vii. ~~Encourage development to utilise shared accesses and infrastructure and to locate within the parts of the site it will minimise disruption to the landform.~~

3.2.5.3 Objective - ~~Direct new urban - Encourage~~ subdivision, use or development to occur in those areas which have potential to absorb change ~~without detracting from landscape and visual amenity values~~ while recognise the importance of natural landscapes.

Policies

3.2.5.3.1 Direct urban development to be within Urban Growth Boundaries (UGBs) where these apply, or within the existing rural settlements townships.

Comment [bf2]: These policies are those originally from 6.3.5 which I consider could be promoted from chapter 6 subject to the amendments shown or like amendments

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.5.4 **Objective** - ~~Recognise there is a finite~~ Enable appropriate capacity for residential activity in rural areas ~~if the qualities of our landscape are to be maintained.~~

Policies

- 3.2.5.4.1 Give careful consideration to cumulative effects in terms of character and environmental impact when considering residential activity in rural areas.
- 3.2.5.4.2 Provide for rural living opportunities in appropriate locations.

~~**3.2.5.5** **Objective** - Recognise that agricultural land use is fundamental to the character of our landscapes.~~

Policies

- ~~3.2.5.5.1 Give preference to farming activity in rural areas except where it conflicts with significant nature conservation values.~~
- ~~3.2.5.5.2 Recognise that the retention of the character of rural areas is often dependent on the ongoing viability of farming and that evolving forms of agricultural land use which may change the landscape are anticipated.~~

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

3.2.6 Goal - Enable a safe and healthy community that is strong, diverse and inclusive for all people.

3.2.6.1 Objective - ~~Provide~~ Enable access to housing that is more affordable.

Policies

3.2.6.1.1 ~~Provide~~ Enable opportunities for low and moderate income Households to live in the District in a range of accommodation appropriate for their needs.

3.2.6.1.2 In applying plan provisions, have regard to the extent to which minimum site size, density, height, building coverage and other controls influence Residential Activity affordability.

3.2.6.1.3 Provide for increased residential density that enables family members to live together on the same site or near each other.

3.2.6.2 Objective - Ensure a mix of housing opportunities.

Policies

3.2.6.2.1 Promote mixed densities of housing in new and existing urban communities.

3.2.6.2.2 Enable high density housing adjacent or close to the larger commercial centres in the District.

3.2.6.2.3 Explore and encourage innovative approaches to design to ~~provide help~~ enable access to affordable housing.

3.2.6.3 Objective - Provide a high quality network of open spaces and community facilities.

Policies

3.2.6.3.1 Ensure that open spaces and community facilities are accessible for all people.

3.2.6.3.2 That open spaces and community facilities are located and designed to be desirable, safe, accessible places.

3.2.6.4 Objective - Ensure planning and development maximises opportunities to create safe and healthy communities through subdivision and building design.

Policies

3.2.6.4.1 Ensure Council-led and private design and development of public spaces and built development maximises public safety by adopting ~~%~~Crime Prevention Through Environmental Design+.

3.2.6.4.2 Ensure Council-led and private design and development of public spaces and built development maximises the opportunity for recreational and commuting walking and cycling.

STRATEGIC DIRECTION 3 [\[APPENDIX BF1 29 FEB 2016\]](#)

- 3.2.7** **Goal - Council will act in accordance with the principles of the Treaty of Waitangi and in partnership with Ngai Tahu.**
- 3.2.7.1** **Objective – Recognise and provide for ~~Protect~~ Ngai Tahu values, rights and interests, including taonga species and habitats, and wahi tupuna.**
- 3.2.7.2** **Objective – Enable the expression of kaitiakitanga by providing for meaningful collaboration with Ngai Tahu in resource management decision making and implementation.**

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

APPENDIX 3.1

Queenstown

3.2.8 Objective - Manage the scale and location of urban growth in the Queenstown Urban Growth Boundary.

Policies

3.2.8.1 Limit the spatial growth of Queenstown so that:

- the natural environment is protected from encroachment by urban development
- sprawling of residential settlements into rural areas is avoided
- residential settlements become better connected through the coordinated delivery of infrastructure and community facilities
- transport networks are integrated and the viability of public and active transport is improved
- the provision of infrastructure occurs in a logical and sequenced manner
- the role of Queenstown Town Centre as a key tourism and employment hub is strengthened
- the role of Frankton in providing local commercial and industrial services is strengthened

3.2.8.2 Ensure that development within the Queenstown Urban Growth Boundary:

- Provides a diverse supply of residential development to cater for the needs of residents and visitors
- Provides increased density in locations close to key public transport routes and with convenient access to the Queenstown Town Centre
- Provides an urban form that is sympathetic to the natural setting and enhances the quality of the built environment
- Provides infill development as a means to address future housing demand
- Provides a range of urban land uses that cater for the foreseeable needs of the community
- Maximises the efficiency of existing infrastructure networks and avoids expansion of networks before it is needed for urban development
- Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities
- Does not diminish the qualities of significant landscape features

3.2.8.3 Protect the Queenstown airport from reverse sensitivity effects, and maintain residential amenity, through managing the effects of aircraft noise within critical listening environments of new or altered buildings within the Air Noise Boundary or Outer Control Boundary.

3.2.8.4 Manage the adverse effects of noise from Queenstown Airport by conditions in Designation 2 including a requirement for a Noise Management Plan and a Queenstown Airport Liaison Committee.

Comment [bf3]: In my opinion these provisions could be amended/replaced so that they provide a transparent methodology/criteria that can be applied to locating the respective UGBs on a case-by-case basis.

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

Arrowtown

3.2.9 Objective - Manage the scale and location of urban growth in the Arrowtown Urban Growth Boundary.

Policies

3.2.9.1 Limit the spatial growth of Arrowtown so that:

- Adverse effects of development outside the Arrowtown Urban Growth Boundary are avoided.
- the character and identity of the settlement, and its setting within the landscape is preserved or enhanced.

3.2.9.2 Ensure that development within the Arrowtown Urban Growth Boundary provides:

- an urban form that is sympathetic to the character of Arrowtown, including its scale, density, layout and legibility in accordance with the *Arrowtown Design Guidelines 2006* (and any adopted updates).
- opportunity for sensitively designed medium density infill development in a contained area closer to the town centre, so as to provide more housing diversity and choice and to help reduce future pressure for urban development adjacent or close to Arrowtown's Urban Growth Boundary.
- a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowtown
- for Feehley's Hill and land along the margins of Bush Creek and the Arrow River to be retained as reserve areas as part of Arrowtown's recreation and amenity resource.
- Recognise the importance of the open space pattern that is created by the inter-connections between the golf courses and other Rural General land

STRATEGIC DIRECTION 3 [APPENDIX BF1 29 FEB 2016]

Wanaka

3.2.10 Objective - Manage the scale and location of urban growth in the Wanaka Urban Growth Boundary.

Policies

3.2.10.1 Limit the spatial growth of Wanaka so that:

- The rural character of key entrances to the town is retained and protected, as provided by the natural boundaries of the Clutha River and Cardrona River
- A distinction between urban and rural areas is maintained to protect the quality and character of the environment and visual amenity
- Ad hoc development of rural land is avoided
- Outstanding Natural Landscapes and Outstanding Natural Features are protected from encroachment by urban development

3.2.10.2 Ensure that development within the Wanaka Urban Growth Boundary:

- Supports increased density through greenfield and infill development, in appropriate locations, to avoid sprawling into surrounding rural areas
- Provides a sensitive transition to rural land at the edge of the Urban Growth Boundaries through the use of: appropriate zoning and density controls; setbacks to maintain amenity and open space; and design standards that limit the visual prominence of buildings
- Facilitates a diversity of housing supply to accommodate future growth in permanent residents and visitors
- Maximises the efficiency of existing infrastructure networks and avoids expansion of networks before it is needed for urban development
- Supports the coordinated planning for transport, public open space, walkways and cycleways and community facilities
- Does not diminish the qualities of significant landscape features
- Rural land outside of the Urban Growth Boundary is not developed until further investigations indicate that more land is needed to meet demand.

PLANNING EVIDENCE OF BEN FARRELL FOR CHAPTERS 3, 4, 6
APPENDIX BF2 – 32 COMMENTARY

SECTION 32AA AND SECTION 32(1) TO (4)

- 1) Section 32AA of the Act requires a further evaluation of changes to a Plan Change since the previous analysis (Councils version notified in August 2015 and as amended in the respective s.42A reports prepared by Mr Paetz [for chapters 3 and 4], and Mr Barr [for chapter 6]). This applies to the amendments that I have recommended in my evidence. They require a consideration to be had in terms of s.32(1) to s.32(4).
- 2) I confirm that I have read the original (notified) s.32 analysis and the amended versions prepared by Mr Paetz and Mr Barr respectively.
- 3) I consider the amendments I recommend to be more appropriate in planning terms than the notified version of the PDP or the version recommended in the s.42A Reports. My key reasons are summarised on the attached table. My reasons build on the s.32 evaluations previously provided by QLDC to date and therefore focus on the differences my amendments would make compared to those set out in the s.42A Reports.

Table 1 s32A evaluation of amendments recommended by Ben Farrell 29 Feb 2016

	Section	Summary of amendment	Cost difference	Benefit difference	Reason why more appropriate than notified/s42A versions (efficiency and effectiveness)
1	3.1 Purpose	Amend so that the special qualities are a goal (or objective)	No difference.	Avoids uncertainty as to the nature of the provision	Removes ambiguity and strengthens role of the purpose statement.
2	Policy 3.2.1.1.3	Amend to ensure promotion of the growth of the visitor industry is not restricted to central business areas or town centres	Potentially small increased opportunity cost to town-centres but no overall cost to district (investment retained in smaller settlements). Also, policy not an active directive so no major implications.	Promotes investment of tourism activity/infrastructure throughout the district not just town centres. Could assist in relieving stress on town centre infrastructure.	Recognises that tourism growth will and can occur throughout the district, not just town-centres which are not able to accommodate all tourism growth.
3	New policies 3.2.1.4.1-2.1.4.6	Insert to implement new Objective 3.2.1.4 (recognising and providing for significant socioeconomic benefits of tourism activities across the district)	Potential increased cost difference with implementing new policy 3.2.1.4.4 in terms of managing/restricting proposals that may be incompatible with tourism related buildings, structures, airports.	Ensures proposals that may be incompatible with existing tourism buildings, structures and airports can be protected from new incompatible activities.	Current provisions do not satisfactorily recognise and provide for tourism activities.
4	Objective 3.2.1.6	Amend to clarify that the districts rural land does not have a strong productive value of farming	Reduced cost (see benefit)	Small reduction in costs as avoids unnecessary debate in consent applications and plan changes about the contribution of farming to the districts economy. Accurate recognition of the role of farming in terms of the districts productivity.	Strikes appropriate balance by ensuring farming activities do not have preference over more productive land uses in the rural area.
5	Policy 3.2.2.1.1-3.2.2.1.7	Retain UGB policies in strategic directions chapter	No difference.	Ensures provisions retained at highest level in the document.	Ensures retention of these provisions if chapter 4 deleted (as recommended).
6	Policy 3.2.2.1.1	Amend to refer to methodology/criteria for establishing and locating UGBs	No difference.	Enables more transparency and consistency in application of UGBs.	Enables more transparency and consistency in application of UGBs.

	Section	Summary of amendment	Cost difference	Benefit difference	Reason why more appropriate than notified/s42A versions (efficiency and effectiveness)
7	Policy 3.2.2.1.3	Amend to clarify that it is expected that UGBs may be modified via plan change processes	Reduced cost (see benefit)	Small reduction in costs avoids potential debate in plan changes about the location of UGBs. Removes ambiguity. Clarifies intent of provision that UGBs can potentially be modified via plan change process.	Removes ambiguity. Supports and clarifies intent of the provision as discussed in the s42A Report.
8	Objective 3.2.4.4	Amend to include reference to indigenous nature conservation values	Reduced cost (see benefit)	Small reduced cost as objective narrowed. Focuses policy on indigenous nature conservation values which is the intent of the provision . and lies at the heart of nature conservation.	Focuses policy on indigenous nature conservation values which is the intent of the provision . and lies at the heart of nature conservation.
9	Policy 3.2.4.4.1	Delete policy			
10	Objective 3.2.5.1	Amend objective so the objective focuses on protecting the %natural character+ of ONFLs from % an appropriate+development	<u>Natural character.</u> Reduced cost (see benefit) <u>Inappropriate</u> Reduced cost (see benefit)	<u>Natural character.</u> Reduces cost because it focuses reach of objective. Focuses policy on natural character values which lies at the heart of s6b <u>Inappropriate</u> Small reduced cost as avoids debate about the inherent intent of the objective. Removes ambiguity/clarifies intent of the objective.	<u>Natural character.</u> Notified version more appropriate as natural character values should be the focus of ONFL protection, particularly in the QLDC district which relies heavily on its outstanding natural values to attract visitors and grow the tourism industry. <u>Inappropriate</u> Removes ambiguity/clarifies inherent intent of the objective. Moreover, notified version is not consistent with part 2 of the Act.
12	Policy 3.2.5.1.1	Amend policy to ensure ONFLs are protected from % an appropriate+ adverse effects of subdivision and development	Reduced cost (see benefit)	Small reduced cost as avoids debate about the inherent intent of the objective. Removes ambiguity/clarifies intent of the objective.	Removes ambiguity/clarifies inherent intent of the objective. Moreover, notified version is not consistent with part 2 of the Act.

	Section	Summary of amendment	Cost difference	Benefit difference	Reason why more appropriate than notified/s42A versions (efficiency and effectiveness)
13	Objective 3.2.5.2	Amend objective to shift focus away from maintaining and enhancing rural character to providing for subdivision use and development in the RL where it maintains or enhances amenity values.	Potentially increased costs to anthropocentric rural landscape values associated with potential loss of existing rural character values.	Reduces costs on land development processes and increases opportunities for housing supply in appropriate locations.	More accurate reflection of existing characteristics in the Wakatipu Basin RL. Reduces costs on land development while maintaining and enhancing amenity values.
14	Policy 3.2.5.2.1	Amend policy to shift focus minimising adverse effects on the RL to recognising its value as a rural living resource, incorporating the provisions of Objective 6.3.5 (with amendment)	Reduced cost (see benefit) No other differences as provision promoted from chapter 6.	Reduces costs on land development processes and increases opportunities for housing supply in appropriate locations. Some potential cost to anthropocentric values associated with some loss of existing rural characteristics.	More accurate reflection of existing characteristics in the Wakatipu Basin RL. Reduces costs on land development while maintaining and enhancing amenity values.
15	Objective 3.2.5.3	Amend to shift focus of policy to encouraging RL subdivision and development in areas that can absorb change while recognising the importance of natural landscapes	Potentially increased costs to anthropocentric rural landscape values associated with potential loss of existing rural character values.	Reduces costs on land development processes and increases opportunities for housing supply in appropriate locations.	More accurate reflection of existing characteristics in the Wakatipu Basin RL. Reduces costs on land development while maintaining and enhancing amenity values.
16	Policy 3.2.5.3.1	Amend to refer to settlements and not townships	Reduced cost (see benefit)	Small reduced cost by avoiding debate about whether or not the policy applies to rural settlements. Removes ambiguity/clarifies intent of provision to apply.	Reduced cost. Removes ambiguity/clarifies intent of provision to apply.
17	Objective 3.2.5.4	Amend objective to be high level . enabling residential activity in the RL	Potentially increased costs to anthropocentric rural landscape values associated with potential loss of existing rural character values.	Reduces costs on land development processes and increases opportunities for housing supply in appropriate locations.	More accurate reflection of existing characteristics in the Wakatipu Basin RL. Reduces costs on land development while maintaining and enhancing amenity values.

	Section	Summary of amendment	Cost difference	Benefit difference	Reason why more appropriate than notified/s42A versions (efficiency and effectiveness)
18	Objective 3.2.5.5, Policies 3.2.5.5.1-3.2.5.5.2	Delete objective policies seeking to recognise that agricultural land use is fundamental to the districts landscape character	Reduced cost (see benefit)	Small reduction in costs as avoids unnecessary debate in consent applications and plan changes about the contribution of farming to the districts economy. Accurate recognition of the role of farming in terms of the districts productivity.	Strikes appropriate balance by ensuring farming activities do not have preference over more productive land uses in the rural area.
19	New policy 3.2.6.1.3	Insert new policy to provide for increased residential density that enables family members to live together	Potentially increased costs to anthropocentric rural landscape values associated with potential loss of existing rural character values.	Reduces costs on land development processes and increases opportunities for housing supply for families to live together and/or near each other.	Ensures provision can be made for increased residential
20	New Appendix	Insert new provisions (promoted from chapter 4), with amendment, to provide criteria/methodology for locating UGBs	No difference as provisions promoted from Chapter 4.	Removes ambiguity/clarifies where UGBs should be located.	Removes ambiguity/clarifies where UGBs should be located on a case-by-case basis.
	Chapter 4	Delete chapter (specific provisions to be elevated to chapter 3, deleted or demoted to zone or district wide chapters)	Significant reduction in cumulative costs of plan administering (see benefits).	Reduces cost of plan administration on a case-by-case basis by removing uncertainty over hierarchical approach; reducing number of provisions in the district plan that need to be considered on a case-by-case basis; and encourages sharper provisions in other parts of the plan (chapter 3 and zone chapters). Also allows other district issues to be treated equally alongside urban matters (by removing the enforcing approach supported in the s42A Report).	Ensures the consideration of the district's resource management matters are not tipped towards consideration/preference of urban issues over and above other district wide matters.

	Section	Summary of amendment	Cost difference	Benefit difference	Reason why more appropriate than notified/s42A versions (efficiency and effectiveness)
21	Chapter 6	Delete chapter (specific provisions to be elevated to chapter 3, deleted or demoted to zone or district wide chapters)	Significant reduction in cumulative costs of plan administering (see benefits).	Reduces cost of plan administration on a case-by-case basis by removing uncertainty over hierarchical approach; reducing number of provisions in the district plan that need to be considered on a case-by-case basis; and encourages sharper provisions in other parts of the plan (chapter 3 and zone chapters). Also allows other district issues to be treated equally alongside landscape matters (by removing the 'enforcing' approach supported in the s42A Report).	Ensures the consideration of the district's resource management issues are not tipped towards consideration/preference of landscape matters over and above other district wide matters.
22	New water chapter		Reduced cost (see benefit)	Reduction in costs as avoids unnecessary debate in consent applications and plan changes about the significance of the water resource. Accurate recognition of the local, regional, and national significance of freshwater.	Recognises that the district's water resources and related management issues are as significant as the rural and urban resources.