

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

**IN THE MATTER** of the Resource  
Management Act 1991

**AND**

**IN THE MATTER** Stage 3 of the Proposed  
District Plan

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**STATEMENT OF EVIDENCE OF MATTHEW STUART BENTLEY JONES  
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

**LANDSCAPE ARCHITECTURE – REZONINGS - GENERAL INDUSTRIAL ZONE**

**18 March 2020**

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## CONTENTS

	PAGE
1. PROFESSIONAL DETAILS .....	1
2. SCOPE .....	2
3. EXECUTIVE SUMMARY .....	3
4. BACKGROUND .....	4
5. EVIDENCE APPROACH .....	4
6. SUBMISSION 3256: UPPER CLUTHA TRANSPORT LTD.....	5
7. SUBMISSION 3349: CARDRONA CATTLE COMPANY LTD.....	11
8. SUBMISSION 3357: THE STATION AT WAITIRI LIMITED .....	15

## 1. PROFESSIONAL DETAILS

- 1.1 My full name is Matthew Stuart Bentley Jones and I am Registered Landscape Architect with the New Zealand Institute of Landscape Architects (**NZILA**). I hold the position of Associate with Isthmus Group Limited, based in Auckland.
- 1.2 I am qualified with a Bachelor of Landscape Architecture (BLA) from Unitec, Auckland and have over 15 years' experience working on a range of design, project management, landscape planning and urban design projects. My experience includes working at a range of scales, in both rural and urban environments that required resource consent and plan change documentation - including landscape, visual and urban design assessments. Projects include design and assessment of masterplanning, subdivision developments, industrial and commercial developments, apartment building developments, parks and open spaces, and transport and energy infrastructure. I have prepared numerous structure plans for rural, coastal and urban fringe developments which required the integration of design and planning elements.
- 1.3 Of particular relevance to the Proposed District Plan (**PDP**) Stage 3 hearing, I have been involved with expert evaluation, analysis and assessment of sites in rural environments across New Zealand as part of plan change applications or that are undergoing rezoning as part of district plan reviews. This includes working for various councils across New Zealand such as Kaipara District Council, Waikato District Council, the Hutt City Council and Auckland Council.
- 1.4 I am an appointed member of the Auckland Urban Design Panel and am currently Chairman of the Auckland Branch of the NZILA.
- 1.5 I have been engaged by the Queenstown Lakes District Council (**QLDC** or **Council**) to provide evidence in relation to landscape architectural matters for rezoning submissions seeking General Industrial Zone (**GIZ**). This statement of evidence relates to site-specific **General Industrial rezoning** requests for the following submitters:

- (a) Submission 3256: Upper Clutha Transport Ltd.
- (b) Submission 3349: Cardrona Cattle Company Ltd.
- (c) Submission 3357: The Station at Waitiri Ltd.

**1.6** I visited the respective sites on 10 and 11 February 2020 and undertook either a roadside or on-site review and assessment. I am familiar with the wider landscape within which these sites are located.

**1.7** The key documents I have used, or referred to, in forming my view while preparing this evidence are:

- (a) The notified Chapter 18A General Industrial Zone of the PDP;
- (b) Chapter 23 Gibbston Character Zone of the PDP;
- (c) The relevant submissions relating to the respective sites; and
- (d) Mr Barr's Stage 3 Strategic Evidence (**Strategic Evidence**).

**1.8** Although this is a Council hearing, I confirm that I have read the Code of Conduct for Expert Witness contained in the Environment Court Practice Note and that I agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise, except where I state that I am relying on the evidence of another person.

## **2. SCOPE**

**2.1** My evidence is structured as follows:

- (a) Executive Summary.
- (b) A 'background' section within which I provide a high level summary of the context and intent of the GIZ.
- (c) An outline of the 'evidence approach' I have taken in the analysis and assessment of the appropriateness of the GIZ for each submission site.

(d) Discussion of each submission site based on high level landscape analysis and which includes recommendations as to how GIZ might be successfully absorbed.

**2.2** Subsequently, I provide my opinion on the respective rezoning requests as to whether I oppose or do not oppose the relief sought in terms of landscape effects.

### **3. EXECUTIVE SUMMARY**

**3.1** With respect to the Upper Clutha Transport submission (**3256**), I consider that based on my high level landscape analysis there is the potential for the site to successfully absorb the development anticipated within the GIZ zone. This is based upon the site's proximity to Luggate, the adjacent land uses, the sites favourable topography and that the site provides a logical extension to the township.

**3.2** However, a detailed landscape assessment has not been provided and as the submission currently stands I oppose the relief sought. Support for the rezoning could be provided from a landscape perspective subject to the landscape analysis.

**3.3** For the Cardrona Cattle Company Ltd submission (**3349**) and the Station at Waitiri Ltd submission (**3357**), based on my high level analysis, in my opinion there is not capacity for these sites to accommodate the type of development anticipated within the GIZ.

**3.4** These two sites are both located within the Gibbston area, east of the Nevis Bluff on the Victoria Flats. In my opinion, the GIZ rezoning is inappropriate based upon the sites existing character and landscape features, the development anticipated within the GIZ, the site's visibility, the lack of built form in the context of the site and the objectives of the underlying Gibbston Character Zone (**GCZ**) related to the associated landscape attributes.

## 4. BACKGROUND

- 4.1 It is my understanding that the purpose of the GIZ is to provide for the establishment, operation and long term viability of Industrial and Service activities.
- 4.2 The primary objective is to enable Industrial and Service activities within the zone and support their **long term viability**<sup>1</sup>. The secondary objective is that these activities are **not undermined by incompatible land uses**<sup>2</sup>.
- 4.3 The third objective is to provide a **level of amenity**<sup>3</sup> in relation to making it a pleasant, healthy and safe place to work and visit. The fourth objective is that activities and development within the zone are undertaken in a way that **does not adversely affect the amenity of other zones**<sup>4</sup>. (my emphasis added)
- 4.4 The submissions received are seeking rezoning from either the 'Rural' zone, the GCZ or a combination of both, to GIZ. This is outlined further below.

## 5. EVIDENCE APPROACH

- 5.1 Time constraints and the nature of the submissions received has not permitted a detailed landscape assessment of the respective sites. Rather my evaluation is effectively 'high level', and addresses the following:
- (a) A brief description outline of the planning history related to the site through the PDP process (where applicable).
  - (b) A brief description of the existing landscape character of the area(s) proposed for rezoning.
  - (c) Commentary as to whether, from a landscape perspective, the proposed rezoning is appropriate in this setting with a brief

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1 Refer Objective 18A2.1 of Chapter 18A (General Industrial Zone) of the PDP.

2 Refer Objective 18A2.2.

3 Refer Objective 18A2.3.

4 Refer Objective 18A2.4.

explanation of the factors that weigh in favour of the opinion expressed.

- (d) Throughout this statement of evidence, I provide an outline of potential landscape opportunities and constraints associated with the area proposed for rezoning. In general, identified landscape constraints are those likely to have the potential to detract from landscape values, and the identified landscape opportunities have the potential to enhance landscape values.

- 5.2 Subsequently, I provide my opinion on the submission request as to whether I oppose or do not oppose the relief sought in terms of landscape effects.

## **6. SUBMISSION 3256: UPPER CLUTHA TRANSPORT LTD.**

- 6.1 The submission provided by Upper Clutha Transport Ltd relates to a 13.89ha area of land east of Church Road, Luggate (the “**UC site**”), as shown on Figure 1 below.
- 6.2 The site is irregular in shape and includes a closed landfill site in the northern portion, an area of mature pine vegetation in its centre and rough grassland terrace to the south. The site wraps around a bend in the Clutha river, which forms its eastern boundary. To the north of the site and the immediate southwest are established industrial activities including the Luggate Sawmill.

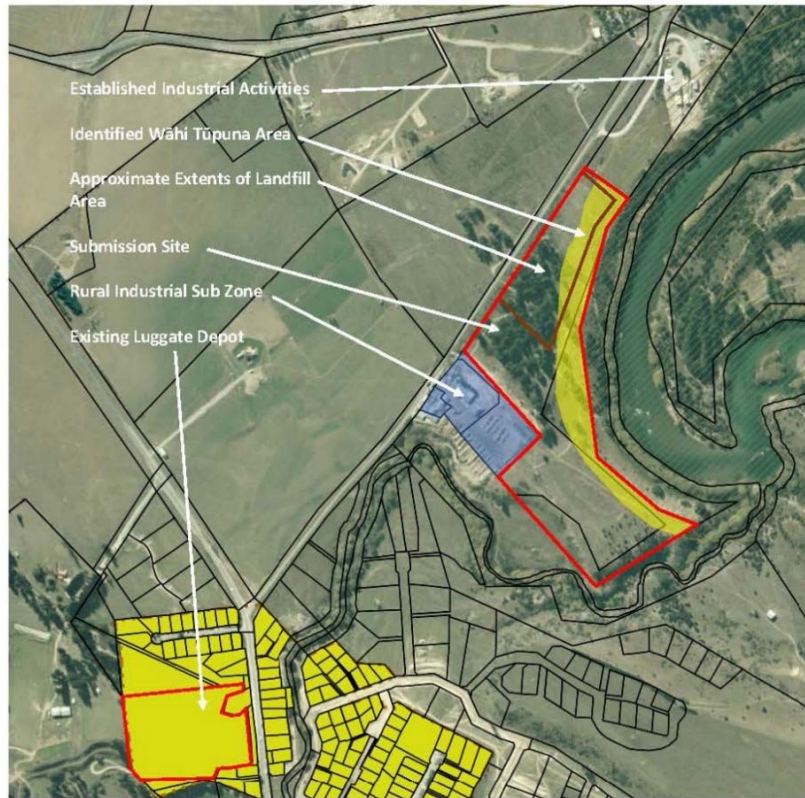
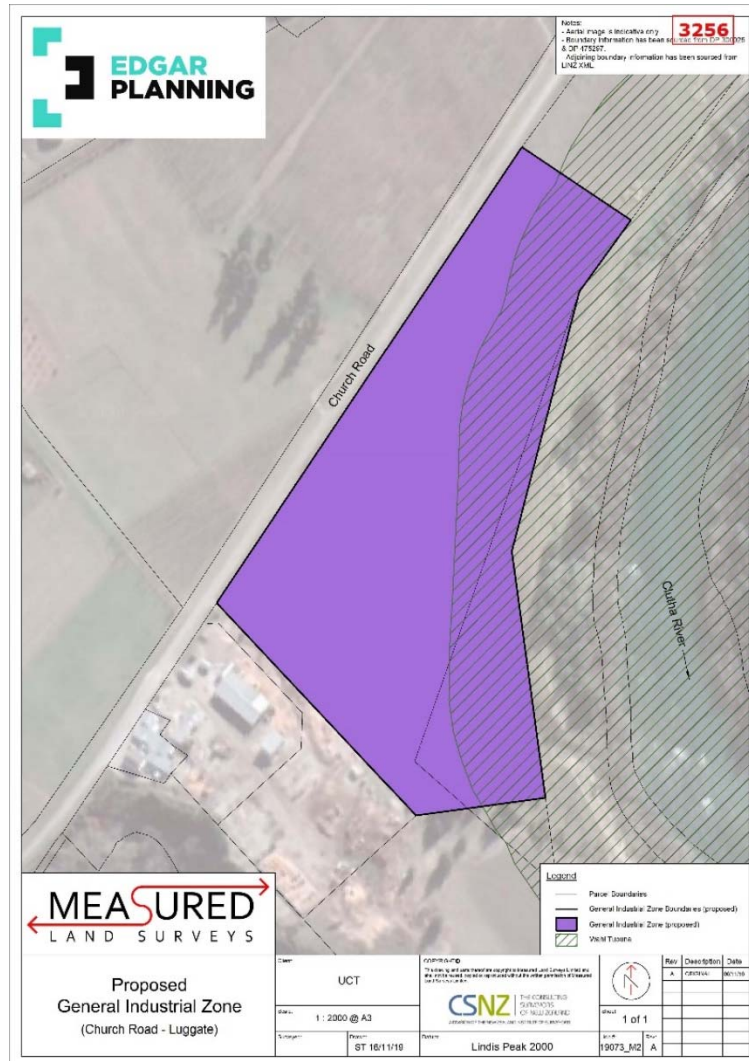


Figure 1: The context of the UC site<sup>5</sup>

<sup>5</sup> As provided within Submission 3256.





**Figure 2:** Extent of the proposed General Industrial Zone within Submission 3256<sup>6</sup>

**6.3** The UC site was confirmed as Rural Zone in the Council's Stage 1 decisions. The submission seeks to rezone the northern part of the UC site to GIZ, retaining the south-eastern section as Rural. It is noted that under Stage 3 of the notified PDP the site has been identified as including two Wāhi Tūpuna areas.

**6.4** The submission argues that Stage 3 of the notified PDP fails to acknowledge and provide for the established industrial and service activities being undertaken at Upper Clutha Transport's (UCT) Luggate Depot which has been rezoned as Settlement Zone. The rezoning of the current premises of the UC operation will restrict expansion and

6 As provided within Submission 3256.

perpetuate reverse sensitivity effects. The submission states that rezoning part of the UC site to GIZ will provide for the relocation and therefore the continuation of UCT's existing activities.

### *Existing Landscape Character and Attributes*

**6.5** An expert landscape assessment has not been provided as part of the submission. However, the UC site is assessed to have the following landscape characteristics and attributes:

- (a) The site has largely level topography, gently sloping toward the banks of Upper Clutha River immediately adjacent to the east.
- (b) It is set upon an elevated terrace above the river.
- (c) It currently has areas of open, unmanaged land across the site.
- (d) There is an existing stand of mature coniferous (pine) vegetation through the central and southern part of the site. The balance of the landcover is predominantly in open grassland and sporadic, self-seeded vegetation across the site.
- (e) Long distance views to the ranges are available from within the site.
- (f) The immediate proximity includes existing industrial land use to the south, pastoral farming activities across Church Road to the west and Luggate township to the south.
- (g) A small slither of the site within its eastern reaches is located within an ONL (associated with the Clutha River) with the balance set within a Rural Character Landscape.

**6.6** The localised and wider setting of the UC site to the north, east and west is largely characterised by agricultural land uses, interspersed with industrial activities to the north and southwest. The localised setting to the south is characterised by residential and industrial development associated with the northern settlement edge of Luggate township. The site sits within the wider context of a broad basin topography.

**6.7** To the south of the UC site is Luggate Creek which has incised a valley feature through the landscape flowing to its confluence with the Upper Clutha River (east of the site).

**Is the requested GIZ rezoning appropriate for the UC site from a landscape perspective?**

**6.8** Through my assessment of the submission and having undertaken high-level analysis, I consider that there is likely to be capacity for the UC site (excluding the part that is ONL) to accommodate the type of development anticipated within the GIZ subject to the provision of a detailed landscape analysis and assessment (refer Para 6.11 below).

**6.9** In my opinion, the site specific attributes and characteristics which would support partial rezoning of the UC site to GIZ include:

- (a) The adjacent established land uses and settlement fringe location which establish a settlement fringe character to the site and reduce the remoteness of the site, associating the activity with Luggate.
- (b) The zoning provides a compatible land use for the site and surrounding area.
- (c) The proposal will complement the existing adjacent Industrial land uses. In order to avoid potential adverse landscape and visual effects as a result of the proposed rezoning, the future design and spatial arrangement of buildings need to be sensitively designed – respecting the sites landscape attributes. This will also seek to avoid potential adverse effects on the amenity of other zones in the surrounding context.
- (d) The site forms a logical extension to Luggate adjacent and complementary to existing industrial zones.
- (e) The largely level and favourable topography of the site.

**6.10** No assessment has been provided by the submitter as to how its rezoning request will protect the values of the Clutha River ONL. That is the statutory direction in the strategic chapters of the PDP. In order to protect the landscape values of the ONL, it is recommended that any future development proposed on the site avoids this area of ONL.

### **Detailed landscape analysis that is required**

**6.11** In my opinion, the following detailed landscape analysis and assessment is necessary in order to demonstrate that the GIZ rezoning request is appropriate in this location:

- (a) Scaled aerial photographs with detailed contour mapping of the site and its immediate context.
- (b) Detailed site analysis, commentary and mapping in relation to the identification and description of:
  - (i) The site's existing character and its landscape attributes;
  - (ii) The site specific constraints on site relating to the landscape;
  - (iii) The site's opportunities in relation to future development;
- (c) Site mapping in relation to specific future development opportunities relating to the proposed General Industrial zone (e.g. site specific future development areas and potential 'buildable' locations), taking into account the site's landscape attributes and sensitivities.
- (d) Outline of the landscape sensitivity of the site and surrounding context.
- (e) Contextual panoramic photographs of the site.
- (f) Analysis and assessment of the site's visibility (visual amenity assessment).
- (g) Assessment of potential impacts on visual amenity and landscape character.

**6.12** Subject to the submitter undertaking the landscape analysis above and the outcome of that assessment, this submission could be supported from a landscape perspective. At present, I oppose the GIZ rezoning.

**7. SUBMISSION 3349: CARDRONA CATTLE COMPANY LTD**

**7.1** The submission provided by Cardona Cattle Company Limited relates to an area of land between Nevis Bluff and Victoria Bridge, Victoria Flats west of the Kawerau River, totalling an area of 91.4ha as shown on **Figure 3** below (the “**CCC site**”).

**7.2** Also as part of the Stage 3 rezoning submissions I undertook an assessment for a smaller portion of this site for rezoning to Rural Visitor Zone (RVZ) – Cardrona Cattle Company (31039). In relation to the relief sought in that submission, following my assessment and high-level analysis, I consider that there is potential for capacity for the site to accommodate the type of development anticipated by the RVZ subject to the provision and outcomes of a detailed landscape analysis and assessment, which has not been provided by the submitter.

**7.3** The CCC site includes rural / agricultural land located between areas of steep topography.

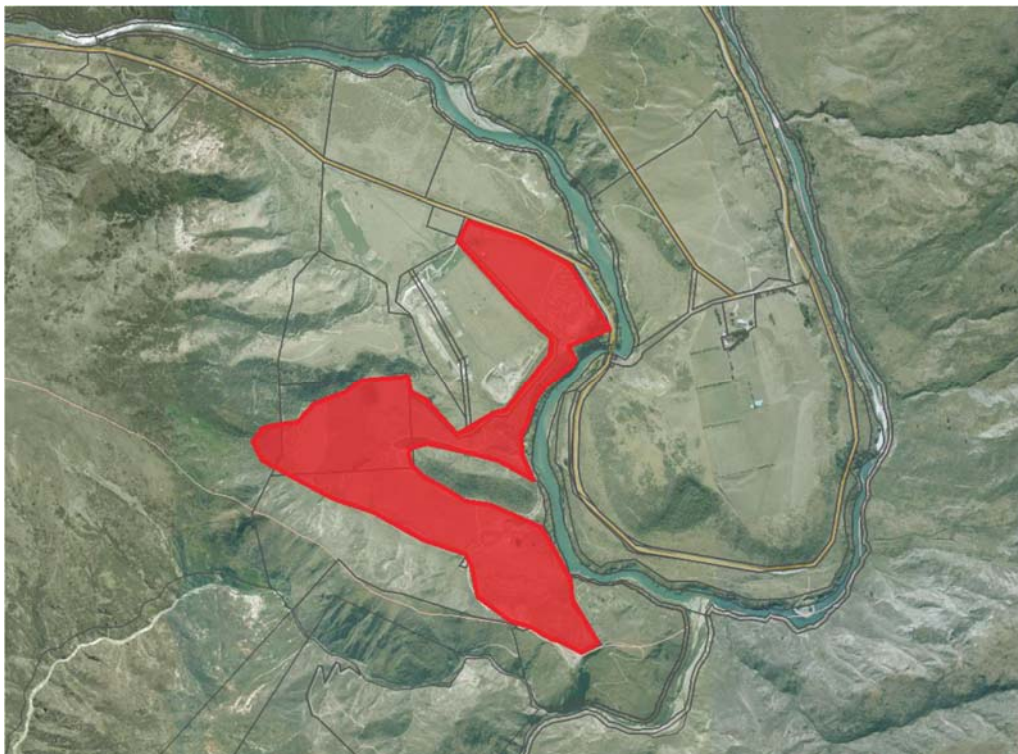


Figure 3: Submission 3349 site

**7.4** The majority of the southern part of the CCC site is zoned GCZ (through Stage 1 of the PDP), with the northern portion and the

southern reaches zoned 'Rural'. The entire CCC site is located within an ONL. I acknowledge that ONF/L and Rural Character Landscape categories and policies in Chapter 6 of the PDP do not apply to sites located within the GCZ, and that the GCZ is listed as an "Exception Zone" in the Court's Topic 2 decision (as explained in Mr Barr's Strategic Evidence). At this stage, I understand there is still a work program directed by the Court, for the Council and parties to consider which strategic objectives and policies do not apply to applications for subdivision, use or development within any of the Exception Zones.

**7.5** The submission seeks to zone the CCC site as GIZ in its entirety. The GIZ is not an Exception Zone and Chapter 6 of the PDP applies to it. It is noted that the northern and north eastern edges of the site are located within Designation 76, which provides a buffer to the adjacent existing landfill, located to the west of the site.

**7.6** The objectives<sup>7</sup> of the GCZ are to:

- (a) "Protect the economic viability, **character** and **landscape values** by enabling **viticulture** activities and controlling adverse effects resulting from **inappropriate activities**,
- (b) Sustain the life supporting capacity of **soils**,
- (c) Safeguard the life supporting capacity of **water** through the integrated management of the effects of activities, and
- (d) Encourage land management practices that recognise and accord the **environmental sensitivity** and **amenity values** of the Gibbston Character zone". (**emphasis added**)

**7.7** These are important provisions to take into account when assessing the appropriateness of the proposed rezoning of the CCC site.

**7.8** The submission also seeks the following changes to the notified GIZ provisions:

- (a) *"Removal of all prohibitive activities*
- (b) *Provision included for custodial residential living and worker's accommodation.*

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7 Refer Chapter 23 'Gibbston Character Zone' of the PDP.

- (c) *Buildings are controlled activities in respect of landscaping external appearance, location of offices and showrooms, and visual impact.*
- (d) *Outdoor storage areas located within any street scene setback are controlled activities in respect of landscaping, screening, appearance and visual impact.*
- (e) *Retail sales are limited to goods manufactured on the site, and ancillary products up to 20% of the gross floor area or are otherwise non-complying.*
- (f) *Visitor accommodation is non-complying.*
- (g) *Buildings are to be set back 10m from SH6 and 2m from all other boundaries.*
- (h) *80% maximum site coverage.*
- (i) *Maximum building height of 10m.*
- (j) *Adherence to noise standards measured at any point outside of the zone.*
- (k) *No minimum allotment size for subdivision.*
- (l) *All necessary refinements are made to the objectives and policies of the Zone”.*

## **Existing Landscape Character and Attributes**

**7.9** An expert landscape assessment<sup>8</sup> has not been provided as part of the submission, although a description of the existing environment is provided. I assess the site as having the following landscape characteristics and attributes:

- (a) The site has an unusual shape, bending around the existing landfill (west), Kawerau River and SH6 (east) and the rising topography to the east and south.
- (b) It includes a large expanse of largely flat, open land within a localised basin landscape.
- (c) The site is of an open character with views to the surrounding ranges.

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<sup>8</sup> As part of a current resource consent application on the northern part of this site, a landscape assessment has been provided by Rough and Milne (October 2019), peer reviewed by Ms Helen Mellsop (November 2019).

- (d) The northern part of the site (zoned 'Rural' and located within an ONL) extends around an existing commercially operated landfill.
- (e) The southern part of the site (predominantly zoned GCZ) has an open, exposed and remote character, with rising topography immediately to the north and south and Kawarau River to the east providing a degree of separation from the localised Victoria Flats setting. This part of the site is largely enclosed by the surrounding topography which affords a degree of containment.
- (f) The southern part of the site is largely devoid of vegetation, with only sporadic cover. This part of the site is currently grazed with cattle.
- (g) Vehicle access is provided via Victoria Flats Road.

**7.10** The localised and wider context of the CCC site is in part characterised by the basin topography of the Victoria Flats, enclosed by the surrounding ranges. Land use within the basin varies between rural, the landfill activity and a rock excavation operation. There are few buildings are apparent within the localised setting, with almost all land uses resulting in ground level or below ground activities.

**7.11** The surrounding ranges remain undeveloped and natural in character. Although, a powerline and pylons traverse the slopes to the west of the CCC site.

**Is the proposed GIZ appropriate for the CCC site from a landscape perspective?**

**7.12** Following my assessment of the submission and high-level analysis, I consider that there is not capacity for the site to accommodate the type of development anticipated within the GIZ.

**7.13** In my opinion, the specific attributes and characteristics within the site which render it inappropriate for GIZ zoning include:

- (a) The site is of a remote character and location and contained by topographical features.



- (b) Although contained by localised topography, the site is visible for long stretches along State Highway 6. Development as anticipated by the GIZ will be incongruous with the surrounding landscape character.
- (c) The site is in part located within the GCZ which seeks to provide for viticulture and associated commercial activities.
- (d) The northern part of the site is located within an ONL. The activities and scale of development anticipated by the notified GIZ are inappropriate in this setting.
- (e) The southern part of the site is of a remote character and location which will not be able to successfully absorb the scale and form of development anticipated by the GIZ.
- (f) There is a lack of existing buildings (including above ground activities and built form) within the localised context of the site. The introduction of development anticipated by the notified GIZ will be inconsistent with the surrounding character and appearing 'out of place'.
- (g) From a landscape perspective, the GIZ zoning is inappropriate for this site. The development potential<sup>9</sup> associated with the notified GIZ and also the recommended amended provisions (included within the submission) in my opinion is inconsistent and would not protect the landscape character and landscape values of the site and surrounding context.

**7.14** Consequently, I **oppose** the relief sought by the submitter #3349.

## **8. SUBMISSION 3357: THE STATION AT WAITIRI LIMITED**

**8.1** The Station at Waitiri Limited submission relates to an area of land adjacent to State Highway 6, Gibbston east of the Nevis Bluff (the "**station site**"), totalling an area of 44.7ha. The station site is a triangular shaped piece of land that wedges between State Highway 6 (south) and the Kawarau River (north) as shown with a red boundary on **Figure 4** below.

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<sup>9</sup> In relation to matters such as Building Setbacks, Building Coverage, Building Height, Glare.



Figure 4: Submission 3357 site

- 8.2** The station site is currently zoned GCZ and the submission seeks to rezone it to GIZ in its entirety. The station site is also located within an ONL. I refer to my evidence in section 6 above in relation to the relevant of Chapters 3 and 6 to the GCZ and the GIZ.
- 8.3** The objectives<sup>10</sup> of the GCZ are outlined within paragraph 7.6 above. These are important provisions to take into account when assessing the appropriateness of the proposed rezoning of the site.
- 8.4** The submission argues that the rezoning of this site will provide more industrial land within the Wakatipu Ward, meeting the industrial demand in the short, medium and long term. The submission also seeks the following changes to the notified GIZ provisions:
- I. Buildings are controlled activities in respect of landscaping, external appearance, location of offices and showrooms, and visual impact.*
  - II. Outdoor storage areas are permitted.*
  - III. Retail sales are limited to goods manufactured on the site, and ancillary products up to 20% of the gross floor area, or are otherwise non-complying.*

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10 Refer Chapter 23 'Gibbston Character Zone' of the PDP.

- IV. *Visitor accommodation is non-complying.*
- V. *One residential unit per site is permitted for the purpose of onsite custodial management.*
- VI. *Buildings are to be set back 5m from SH6 and 2m from all other boundaries.*
- VII. *80% maximum site coverage.*
- VIII. *Maximum building height of 10m.*
- IX. *Adherence to noise standards measured at any point outside of the zone.*
- X. *No minimum allotment size for subdivision.”*

### **Existing Landscape Character and Attributes**

**8.5** An expert landscape assessment has not been provided as part of the submission. However, I consider the site has the following landscape characteristics and attributes:

- (a) The station site is dominated by unmanaged low groundcover vegetation and grassland providing an open landscape character.
- (b) It is perched on a terrace above the Kawarau river, which provides its northern boundary.
- (c) It is enclosed by ranges and steep escarpments which provide an isolated and remote character, largely restricting long distance views to and from the site.
- (d) It is wedged between SH6 and the Kawarau river to the south and north respectively, with the ‘tip’ of the wedge adjacent to the Nevis Bluff. Lower terraces are apparent along the river corridor.
- (e) The site is located within an ONL (although within the underlying GCZ the policies in Chapter 6 do not apply). However, if the site was to rezone to GIZ, I understand that the ‘exception’ that the GCZ has in terms of being located in an ONL, would fall away given the PDP construct. I consider the development anticipated by the GIZ zoning is inappropriate, in an ONL.

- (f) The site is currently located within the GCZ, which includes a series of provisions specific to the landscape qualities and values of the area.

**8.6** The localised and wider setting of the station site is characterised by the basin topography to the south east, which is enclosed by the surrounding ranges. Land use within the basin varies between rural, the landfill activity and a rock excavation operation. There are few buildings are apparent within the localised setting, with almost all land uses resulting in ground level or below ground activities.

**8.7** Vegetation in the area includes pastoral grassland, groundcover vegetation and grassland, shelter belts and areas unmanaged scrub predominantly on the rising topography.

**8.8** The surrounding ranges within the immediate context remain undeveloped and natural in character.

**Is the proposed GIZ appropriate for the station site from a landscape perspective?**

**8.9** Following my assessment of the submission and high-level analysis, I consider that there is not capacity for the site to accommodate the type of development anticipated within the GIZ.

**8.10** In my opinion, the site specific attributes and characteristics which are inconsistent with the GIZ include:

- (a) The station site is of a remote character and location and contained by topographical features. It has landscape qualities which do not have the ability to absorb the type of development anticipated by the notified GIZ.
- (b) Although contained by localised topography, the site is visible for long stretches along SH6. Development as anticipated by the notified GIZ will be incongruous with the surrounding landscape character.

- (c) From a landscape perspective, the GIZ zoning is inappropriate for this site. The development potential<sup>11</sup> associated with the notified GIZ and also the recommended amended provisions (included within the submission) in my opinion is inconsistent and would not protect the landscape character and landscape values of the site and surrounding context.
- (d) The development anticipated within the notified GIZ would result in adverse effects on the amenity of the other, adjacent zones. Namely, the Rural and Gibbston Character zones proximate to the site within the basin.
- (e) There is a lack of above ground activities and existing buildings within the localised context of the site. In my opinion, the introduction of the type of development anticipated by notified GIZ is inappropriate and is inconsistent with the surrounding character.
- (f) The site forms a visual 'gateway' into this part of Gibbston, east of the Nevis Bluff with elevated views available across the site from SH6 to the west.
- (g) The proposed changes sought to the General Industrial Zone provisions will allow for development of a scale, volume and coverage which, in my opinion, would be inconsistent with the surrounding landscape.

**8.11** Consequently, I oppose the relief sought by the submitter #3357.



**Matthew Jones**  
**18 March 2020**

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11 In relation to matters such as Building Setbacks, Building Coverage, Building Height, Glare.