BEFORE THE HEARINGS PANEL FOR THE PROPOSED QUEENSTOWN LAKES DISTRICT PLAN

IN THE MATTER of the Resource Management Act

1991

AND

IN THE MATTER of the Queenstown Lakes Proposed

District Plan

AND

IN THE MATTER of Hearing Submissions Seeking

Amendments to the Planning Maps covering Queenstown and Queenstown Rural (Excluding

Wakatipu Basin)

STATEMENT OF EVIDENCE OF NICHOLAS KARL GEDDES ON BEHALF OF

Middleton Family Trust

(Submitter 338)

Dated 4th June 2017

1.0 QUALIFICATIONS AND EXPERIENCE

- 1.1 My name is Nicholas Karl Geddes. I hold a degree of Bachelor of Science majoring in Geography and Graduate Diploma in Environmental Science from Otago University.
- 1.2 I have fifteen years' experience as a resource management practitioner, with past positions as a Planner in local Government in Auckland, private practice in Queenstown and contract work in London, England. I have been a practicing consultant involved in a wide range of developments, district plan policy development and the preparation and presentation of expert evidence before Councils.
- 1.3 I was employed by a Queenstown consultancy in 1999 before moving to Auckland City Council in 2001 where I held a senior planning position with Auckland City Environments. Leaving Auckland in 2005 I worked in London as a planner for two and a half years before returning to Queenstown where I have been practicing as a planning consultant since. I currently hold a planning consultant position with Clark Fortune McDonald & Associates Limited.
- 1.4 I have read the Code of Conduct for Expert Witnesses in the Environment Court consolidated Practice Note (2014). I agree to comply with this Code of Conduct. This evidence is within my area of expertise, except where I state I am relying on what I have been told by another person. I have not omitted to consider material facts known to me that might alter or detract from the opinions that I express.
- 1.5 I have authored submissions on the plan review, prepared evidence and attended hearings in relation to the following Chapters:
 - a. Chapter 4 Hearing Stream 1B in relation to Submission 414;
 - b. Chapter 21 & 22 Hearing Stream 2 in relation to Submissions 228, 233, 235, 411 & 414;
 - c. Chapter 27 Hearing Stream 4 in relation to Submission 414;
 - d. Chapter 7 Hearing Stream 6 in relation to Submission 336;
 - e. Chapter 41 Hearing Stream 9 in relation to Submissions 342 & 715;

f. Planning Maps – Hearing Stream 12 in relation to Submission 314.

EXECUTIVE SUMMARY

- a. The submission seeks to re-zone land from Rural to Rural Residential and Low Density Residential (with an overlay applied to part) alongside Escarpment Protection Areas, Open Space – Edge Protection and an Open Space – Central Corridor. The proposed re-zoning includes a road which traverses the site from Tuckers Beach Road to the roundabout opposite Hawthorne Drive on SH6.
- b. All activities contained in the proposed re-zoning can be fully serviced.
- c. Council's reports and the comments raised in further submissions have informed a number of changes to the proposed structure plan and amended policy provisions.
- d. Expert evidence supports the proposed re-zoning in the areas of infrastructure and traffic.
- e. In preparing this evidence I have evaluated these proposals against relevant National Policy Statements and Regional Policies both operative and proposed, relevant matters contained in Part 2 of the Act and addressed other relevant statutory matters.
- f. An assessment of environmental effects has been undertaken where adverse effects relate to the landscape. In preparing this evidence I have evaluated the proposed re-zoning and its relative effectiveness and efficiency against the requirements of s.32AA.

2.0 SCOPE OF EVIDENCE

- 2.1 The purpose of this evidence is to assist the Hearings Panel within my expertise of resource management planning in relation to the submission lodged by Middleton Family Trust (#338) on the Queenstown Lakes Proposed District Plan.
- 2.2 I have prepared evidence where I assess and explain:
 - a) Submission 715;

- b) National Policy Statements;
- c) Regional Policy Statements;
- d) Proposed Queenstown Lakes District Plan Strategic Chapters;
- e) Part 2 of the Act;
- f) Assessment of Environmental Effects;
- g) Section 32A(A) Evaluation;
- h) Other Statutory requirements;
- i) Further Submissions;
- j) Section 42A Report.
- 2.3 In the preparation of this evidence I have reviewed the following:
 - a. Section 32 Evaluation Reports, Council s.42A Reports and QLDC rightof-reply for the following PDP Chapters; Strategic Chapters 3-6, Rural Residential and Rural Lifestyle, Rural, Subdivision and Residential.
 - b. Associated evidence submitted on behalf of QLDC prepared by Ms Helen Mellsop, Mr Glenn Davis, Mr Timothy Heath, Ms Wendy Banks, Dr Marion Read, Mr Ulrich Glasner, Mr Denis Mander, Mr Phillip Osborne and Mr Stephen Chiles.
 - c. The relevant submissions and further submissions of other submitters.

- 2.4 In addition to the above, I have reviewed the reports and statements of evidence of other experts including:
 - a. Traffic from Mr Jason Bartlett Traffic Engineer, Principal, Bartlett Consulting Ltd
 - b. Infrastructure from Mr Chris Hansen Surveyor, Survey Manager, Clark Fortune McDonald & Associates Ltd.
 - c. Natural Hazards from Mr Paul Faulkner Senior Engineering Geologist,
 Geosolve Ltd.

Abbreviations:

Queenstown Lakes District Council - "QLDC"

Proposed District Plan - "PDP"

Operative District Plan - "ODP"

Resource Management Act 1991 - "The Act"

Rural Residential Zone - "RRZ"

Low Density Residential Zone - "LDRZ"

Low Density Residential Zone - Tucker Beach Overlay - "LDRZ-TBO"

Escarpment Protection Area - "EPA"

Open Space Corridor- "OSC"

Building Restriction Area - "BRA"

Strategic section 42A report - "Ss.42A"

Group 1B Queenstown Urban - Frankton and South section 42A report - "s.42A"

National Policy Statement: Urban Development Capacity 2016 - "UDC"

Special Housing Area - "SHA"

Operative Otago Regional Policy Statement – "OORPS"

Proposed Otago Regional Policy Statement – "PORPS"

3.0 SUBMISSION 338

3.1 Since the time of the submission being lodged, further consideration has been given to the proposed plan provisions sought based upon the technical advice received, and in particular to concerns raised in further submissions and the evidence lodged by Council and other parties. On this basis Submission #338 has been amended as detailed on the Plan contained in Appendix 1 and described below.

Escarpment Protection Area

- 3.2 At the time of any future subdivision consent this area will become an "Escarpment Consent Notice Area" where no building or further subdivision can occur and prior to any subdivision activity these areas will be cleared of any pest species being gorse, broom, briar, tree lupin, hawthorn, crack willow, buddleia, Californian thistle, and any other Pest Plant as specified in the Regional Pest Management Strategy for Otago.
- 3.3 Native 'Grey Shrubland' planting on these areas will be introduced to achieve a 15% site coverage (canopy closure) at maturity. A species list for these areas is contained in Appendix 2.
- 3.4 A condition of any future subdivision consent is anticipated to require all planting to be implemented and irrigated prior to 224(c) approval and a maintenance period of five years on all tree species

Open Space - Central Corridor

- 3.5 At the time of any future subdivision consent this area will become an "Central Corridor Consent Notice Area" where no building or further subdivision can occur and prior to any subdivision activity these areas will be cleared of any pest species being gorse, broom, briar, tree lupin, hawthorn, crack willow, buddleia, Californian thistle, and any other Pest Plant as specified in the Regional Pest Management Strategy for Otago.
- 3.6 Native planting on these areas will be introduced to achieve a 20% site coverage (canopy closure) at maturity. A species list for these areas is contained in Appendix 2.

3.7 A condition of any future subdivision consent is anticipated to require all planting to be implemented and irrigated prior to 224(c) approval and a maintenance period of five years on all tree species

Open Space – Edge Protection

- 3.8 At the time of any future subdivision consent this area will become an "Edge Protection Consent Notice Area" where no building or further subdivision can occur and prior to any subdivision activity these areas will be cleared of any pest species being gorse, broom, briar, tree lupin, hawthorn, crack willow, buddleia, Californian thistle, and any other Pest Plant as specified in the Regional Pest Management Strategy for Otago.
- 3.9 These are intended to be retained in pasture grasses.

Low Density Residential

3.10 The Low Density Residential Zone provisions as promoted in the Council's right-of-reply for Hearing Stream 6 are to be applied to land identified on the revised plan outlined in 'yellow'.

Low Density Residential – Tuckers Beach Overlay

- 3.11 The Low Density Residential Zone provisions as promoted in the Council's right-of-reply for Hearing Stream 6 with amendments set out in Appendix 3 are to be applied to land outlined in on the revised plan in 'red'.
- 3.12 The amendments relate to providing a maximum height of 5.5 metres above ground level.
- 3.13 The residential components of the submission listed above result in a total developable area of 53ha where it is expected that 1060 dwelling houses can be accommodated.

Rural Residential

- 3.14 The Rural Residential Zone provisions as promoted in the Council's right-of-reply for Hearing Stream 2 are to be applied to land identified on the revised plan denoted by 'orange' diagonal lines.
- 3.15 The rural residential component of the submission results in a total developable area of 18ha where it is expected that 45 dwelling houses can be accommodated.

Tuckers Beach Trail

- 3.16 A trail is denoted in "pink" to provide pedestrian and cycle access to the southern end of Lake Johnson from the formed end of Hansen Road traversing the edge of the escarpment to the northern end of Lake Johnson where it follows the outlet of Lake Johnson to Tuckers Beach Reserve.
- 3.17 The trail is intended to be held in an easement in favour of QLDC and will meet QLDC "Cycle Trail Design Standards and Specifications".

Access

3.18 With reference to the plan contained in Appendix 1 the access road (blue) has been amended from the original submission to provide a direct connection to the western end of Tuckers Beach Road. An extension to Tuckers Beach Road is proposed in "burgundy" to facilitate the location of servicing and require these access roads to not carry any thoroughfare traffic. The current unformed portion of Tuckers Beach Road will require to be upgraded.

5.0 STATUTORY CONSIDERATIONS

5.1 The statutory framework for assessing the merits of any submission seeking to apply a zone has been correctly set out in paragraph 9.2 of the Ss.42A report where the matters listed (a) to (j) have been addressed under relevant headings within this Part of my evidence.

National Policy Statements

- 5.2 Section 75(3) requires that a district plan must give effect to any national policy statement; any New Zealand Coastal Policy Statement; and any regional policy statement.
- 5.3 The following National Policy Statements have been considered:
 - Urban Development Capacity
 - Freshwater Management
 - Renewable Electricity Generation
 - Electricity Transmission
 - Coastal Policy Statement
- 5.4 With the exception of Urban Development Capacity, in my opinion, none of the remaining policy statements listed above are relevant.
 - National Policy Statement on Urban Development Capacity 2016 (UDC)
- 5.5 QLDC provided a supplementary memorandum regarding the UDC on the 19th April 2017 which considered the definition of 'urban environment' as it would apply to Queenstown. It was concluded and it is concurred that this environment should include the collection of areas within the Wakatipu Basin that together function as a single urban environment and should not be limited by the physical constraints (natural features) which may geographically dissect the basin.
- 5.6 Based upon the contents of the 19th April 2017 memorandum I consider that the subject site is firmly placed within the 'urban environment' for the purposes of assessment under the UDC.
- 5.7 A full copy of Objectives and Policies set out in the UDC are contained within Appendix 4.
- 5.8 The revised supplementary statement of evidence of Craig Barr (2nd May 2017) towards Hearing Stream 12 provides an assessment against the UDC as it applies to the Wanaka Urban Environment. I concur with the reasons set out in paragraphs 8.24 8.27 of Mr Barr's evidence which conclude Policies PB1-PB7, PC2, PC3, PC5-PC11 and PD1-PD4 are not

- relevant for assessment purposes. In my opinion, these reasons are applicable to the Wakatipu Urban Environment.
- 5.9 The remaining applicable UDC Objectives and Policies are highlighted in bold within the set contained in Appendix 4.
- 5.10 Policy PA1 asks for sufficient housing development capacity at any one time over three time periods up to 2045. The capacity must be feasible (commercially viable) and identified in relevant plans and strategies.
- 5.11 Policies PA3 and PA4 have particular regards for requirements to be recognised at the time of any planning decision. These policies ask the decision maker to not only provide for the social, economic, cultural and environmental wellbeing of people but to have particular regard to providing for choices for a range of dwelling types and locations.
- 5.12 Paragraph 9.22 of the Ss.42A report outlines the DCM is to be addressed in supplementary evidence and confirms in paragraph 9.23 an informed and strategic approach to the delivery of additional capacity will be offered by the end of 2017.
- 5.13 Residential capacity was identified for the Upper Clutha through the evidence of Mr Phillip Osborne, 1st May 2017 and summarized in the supplementary evidence of Mr Barr. Within the "Summary of updated development capacity model for outputs for Upper Clutha" paragraph 7.13 Mr Osborne's evidence includes:

"In assessing the sufficiency of the feasible and realised capacity there is economic justification for considering a longer period of time than that covered by the PDP reviews. A period of 10 years would suggest that a capacity of only 2,500 units would meet the estimated demand however it is considered that a well-functioning housing market requires a large number of potential development opportunities to be available, so that developers and prospective homeowners have a wide variety of choices, and the downward competitive pressure is applied to land prices across the district. If the market has confidence in the sufficiency of future development capacity and supply over the long term, then this will help reduce speculation-driven price increases, as well as encouraging landowners to

- develop their land sooner rather than hold out for higher prices later (i.e. land-bank)."
- 5.14 Speculative driven price increase was identified in the evidence of Mr Osborne towards hearing Steam 6 as being a concern to the Queenstown Residential Environment along with an insufficient supply of residential land and it was noted that a significant proportion of development opportunities are located in more dispersed high priced areas that do not cater for a growing proportion of the residential popululation.
- 5.15 I believe the proposed re-zoning results in feasible residential development capacity which increases the supply of residential land and creates development opportunities outside of existing high priced residential areas. The submitter views Shotover Country as a template for undertaking the potential subdivision of land within the proposed re-zoning and it is anticipated that the low density residential land contained within the current submission will achieve similar market price points as those released by Shotover Country Ltd.
- 5.16 I believe Paragraph 7.13 of Mr Osborne's evidence highlights that a well-functioning housing market requires a large number of potential development opportunities. Paragraph 5.2 of Mr Michael Copeland's evidence towards Hearing Steam 2 is relevant and reproduced here:
 - "There is now a general acceptance in New Zealand and other countries that economic wellbeing and economic efficiency are maximised when investment decisions are left to individual entrepreneurs or firms, without intervention from Government. The essence of this approach is that the efficient use of resources, and therefore "sustainable management" results from the creation of a climate where the market enables people to make investment decisions "to provide for their economic well being". Sometimes "market imperfections" or "externalities" arise because the actions of individuals or firms create positive or negative impacts on others."
- 5.16 Based upon the evidence of Mr Osborne and Mr Copeland I believe that notwithstanding the findings of the DCM and supplementary reporting to be released 16th June 2017 a healthy functioning market is required which is

one that is supported by multiple development opportunities in multiple locations and these should be derived from people and communities providing choices for their social and economic wellbeing in the short and long term. I believe the proposed re-zoning contributes to a healthy market and provides for the social and economic wellbeing of the community. This should be supported by decision markers as set out in policies PA1, PA3 and PA4 of the UDC.

5.17 Paragraph 9.24 of the Ss.42A report reads:

"Further, the PDP is not the only method by which the Council may give effect to the NPS-UDC. Other statutory (for example, Special Housing Areas (**SHAs**) under the Housing Accords and Special Housing Areas Act 2013) and non-statutory methods are available."

5.18 The table contained in Policy PA1 of the UDC states that long term development capacity must be feasible, identified in relevant plans and strategies. Plans are defined under the UDC as any plan under s.43AA of the Act or proposed plans s.43AAC of the Act:

s.43AA: Plan means a regional plan or a district plan.

s.43AAC: Means a proposed plan, a variation to a proposed plan or

change, or a change to a plan proposed by a local authority that has been notified under clause 5 of

Schedule 1 or given limited notification

under clause 5A of that schedule, but has not become

operative in terms of clause 20 of that schedule; and

Includes a proposed plan or a change to a plan proposed by a person under Part 2 of Schedule 1 that has been adopted by the local authority under clause 25(2)(a) of

Schedule 1.

5.19 SHAs are approved as specific land use / subdivision consents under the Housing Accords and Special Housing Areas Act 2013 and the Act. Mindful of the definition above, I question whether a consent approval for a SHA should be considered as being "identified in relevant plans" as required by Policy PA1 of the UDC. The SHA offers a process for approval, rather than the identification of areas suitable for housing.

Operative Otago Regional Policy Statement

- 5.20 Objectives and Policies of the Operative Regional Policy Statement are contained within Appendix 5 of my evidence along with those of the Proposed Regional Policy Statement. In particular;
- 5.21 Objective 5.4.1 relates to the sustainable management of Otago land resource and 5.4.2 seeks to avoid, remedy or mitigate degradation of the natural and physical resources from activities using the land resource.
- 5.22 Objective 5.4.3 seeks to protect outstanding natural features and landscapes.
- 5.23 Policy 5.5.4 promotes the diversification and use of the land resource to achieve sustainable land use and management systems and uses. This is supported by Objective 3.2.1.4 and must be considered with reference to UDC Objectives and Policies.
- 5.24 Policy 9.5.4, addresses the effects of urban development and settlement.
- 5.25 Policy 9.5.5 promotes the quality of life for people and communities within Otago's built environments, though the identification and provision of an acceptable level of amenity; management of effects on communities' health and safety from the use, development and protection of natural and physical resources; and managing effects on landscape values.
- 5.26 I believe that submission #338 is consistent with relevant Objectives and Policies of the Operative Regional Policy Statement for the following reasons:
 - a. The effects of the proposed re-zoning have been discussed in Part 6 where it is concluded that adverse effects relate to the landscape.
 - b. The area to be re-zoned is not considered to contain any high class soils. Any loss of rural productive capacity must be appropriately balanced with contributing to a healthy functioning housing market in creating development opportunity in a central location and offering

people and communities choices for their social and economic wellbeing in the short and long term.

- c. No significant natural systems have been identified within the areas proposed to be rezoned. Lake Johnson is a recognised area of ecological importance and high amenity value and adjoins the proposed access road which traverses from SH6. Runoff from the development area has been discussed in the evidence of Mr Hansen where it is confirmed that any post-development stormwater runoff can be directed to avoid discharge into Lake Johnson.
- d. The proposed zoning is not within a statutory management area with respect to lwi and is not considered to frustrate the partnership between Council and Ngai Tahu to collaboratively manage the District's natural and physical resources.
- e. No significant areas of existing indigenous vegetation within the area of the proposed re-zoning have been identified. Areas within the Structure Plan have been identified for the introduction, maintenance and protection of native species.
- f. Air quality will be maintained by Air Standards under the Regional Plan:
 Air.
- g. Assessment of natural hazards has been undertaken and discussed in the evidence of Mr Faulkner where it is concluded that while hazards do exist these should not preclude the proposed re-zoning.
- h. Efficient and effective infrastructure can be developed to service the proposed re-zoning.
- i. Residential development can be undertaken within land proposed to be re-zoned without giving rise to reverse sensitivity effects.
- j. PSI and DSI investigations have been discussed in Part 6 of my evidence where it is considered that any areas subject to HAIL activities will be limited. If identified, these areas can be adequately avoided and/or remedied to provide land fit for residential occupation.

k. It is acknowledged there is a need for further residential land uses.

Proposed Otago Regional Policy Statement

- 5.27 I believe the most relevant Objectives and Policies with the PORPS relate to the identification and management of landscape values, urban growth and development and ensuring there is sufficient residential and commercial land capacity to cater for a 20 year demand. This is supported by Objective 3.2.1.4 and must be considered with reference to UDC Objectives and Policies.
- 5.28 Objectives and Policies of the LDRZ and RRZ promote the principles of good urban design. I believe the application of these zones over land within Submission #338 will not compromise the ability of these Objectives and Policies to establish and administer successful living amenities.
- 5.29 Open Space areas protect key landscape amenities, re-generate indigenous species in areas with mechanisms to protect these areas in the future while locating walking / bike trails within these areas to ensure ongoing enjoyment of these spaces. In addition, these trails provide strategic links to existing public amenity areas such as Tuckers Beach Reserve and Lake Johnson.
- 5.30 I consider that the Objectives and Policies of the PORPS are not materially different and for the reasons outlined in paragraph 5.26 earlier in my evidence I confirm that submission #338 is consistent with key Objectives and Policies within the PORPS.

Proposed Queenstown Lakes District Plan – Strategic Chapters

Chapter 3 - Strategic Directions

5.31 A synopsis of this Chapter has been provided in paragraphs 8.2 – 8.7 of the Ss.42A report and I believe this is an accurate description of Chapter 3. I adopt these paragraphs for the purposes of preamble.

- 5.32 For the reasons outlined in paragraph 5.26 earlier in my evidence, I believe that submission #338 is consistent with each Objective and Policy within Chapter 3.
- 5.33 In addition, I would like to place particular emphasis on Objectives 3.2.6.1 and 3.2.6.2 which directly correlate to the obligations, objectives and policies of the UDC discussed earlier. For the reasons outlined earlier in my evidence I believe that submission #338 provides added security that these objectives will be met.

Chapter 4 – Urban Development

- 5.34 A synopsis of this Chapter has been provided in paragraphs 8.8 8.14 of the Ss.42A report and I believe this is an accurate description of Chapter 4.
 I adopt these paragraphs for the purposes of preamble.
- 5.35 I must note that by adopting paragraphs 8.8 8.14 this does not change my evidence filed towards Hearing Stream 1B in relation to Submission 414. I remain that the intentions of this Chapter will largely be met by bespoke provisions within each relevant lower order Chapter.
- 5.36 Notwithstanding, I do not see this as an impediment to consider any extension of the UGB to include the land proposed to be re-zoned as depicted on the Plan contained in Appendix 1 on the basis that the proposed re-zoning:
 - Is adjacent existing settlement and not sporadic;
 - Can be efficiently and effectively serviced with infrastructure to accommodate the demand from the proposed residential development;
 - Increases vehicle connectivity between Tucker Beach Road and the State Highway opposite Hawthorne Drive.
 - Contributes to a healthy functioning housing market in creating development opportunity in a central location and offering people and communities to afford choices for their social and economic wellbeing in the short and long term

Chapter 5 – Tangata Whenua

- 5.37 A synopsis of this Chapter has been provided in paragraphs 8.15 8.23 of the Ss.42A report and I believe this is an accurate description of Chapter 5.I adopt these paragraphs for the purposes of preamble.
- 5.38 I believe that submission #338 is consistent with each Objective and Policy within Chapter 5 for the following reasons:
 - The proposed re-zoning is not within a statutory management area with respect to lwi.
 - The proposed re-zoning is not considered to frustrate the partnership between Council and Ngai Tahu to collaboratively manage the District's natural and physical resources.
 - There is no known waahi tapu within the area of the proposed re-zoning.
 - If required, Accidental Discovery Protocol can be imposed by conditions of any future resource consent.

Chapter 6 – Landscape

- 5.39 A synopsis of this Chapter has been provided in paragraphs 8.24 8.35 of the Ss.42A report and I believe this is an accurate description of Chapter 6.I adopt these paragraphs for the purposes of preamble.
- 5.40 Key to this strategic chapter are the management and protection of landscapes, areas from adverse effects of subdivision, use and development. Particular emphasis must be attributed to the protection of ONF and ONL landscapes. Provision for residential subdivision and development is afforded only in areas where the character and value of landscapes are maintained.
- 5.41 A landscape assessment was undertaken on behalf of QLDC by Dr Marion Read where her comments are recorded in Part 6 of my evidence and conclude there are adverse effects of the proposed re-zoning on the ONL landscape. This strategic chapter is supported by the evidence of Mr Phillip Osborne where paragraphs 3.2 and 3.3 of his evidence states:

"The Council's Economic Development Strategy, 2015 recognises that 'The environment is revered nationally and internationally and is considered by residents as the area's single biggest asset'.

As with most strategic assets the economic value associated with them is susceptible to conflicting uses. It is important that these activities are managed in a way that is consistent with the direction and objectives of the PDP and the higher order provisions of the RMA, but particularly from an economic perspective in a manner which best provides for the community's economic well-being."

5.42 I accept that it is important to manage activities towards the protection of the areas single biggest asset the environment. However, I consider primary importance must also be placed on the needs of the community and the higher order provisions in the Act which include the provision of the social and economic well being of a community as well as the preservation of landscapes.

Part 2 of the Act

Section 5

- 5.43 Submission #338 seeks to change zoning and has been prepared in order to achieve the purpose of the Resource Management Act 1991 "the Act", which is to promote the sustainable management of natural and physical resources.
- 5.44 This submission is considered to support the purpose of the Act for the following (but not limited too) reasons:
 - Provides for additional residential land to meet future needs enabling the community to provide for their economic well-being;
 - Protects areas of land from any development coupled with comprehensive landscaping design to reduce potential visual effects of the development;
 - All open space areas provided preclude any future building, subdivision and remove pest species;
 - A majority of open space areas seek to re-generate, maintain and protect native plantings.

 Provides access directly from the State Highway network and provides an alternative route to Frankton for residents on Tucker Beach Road.

Section 6

- 5.45 Matters of National Importance. This requires that any submission seeking to locate any zone shall recognise and provide for the appropriate management, use, development, and protection of natural and physical resources.
- 5.46 In the appropriate management, use, development and protection of natural and physical resources a balance must be achieved within the development area. I believe a balance between open space and residential development has been achieved.
- 5.47 I believe a 'higher order' balance must be achieved between the use of land within an ONL and a residential housing shortage which is recognised in a National Policy Statement (UDC), Economic Evidence towards Strategic Chapters and the 'Housing Accord' between Central and Local Governments.

Section 7

5.48 Matters listed (a) to (j) in s.7 of the Act have been considered and for the reasons listed in paragraphs 5.5 – 5.16 (UDC, Economic Discussions), paragraph 5.26 and further supported by paragraphs 6.10 to 6.23 I believe submission #338 takes steps towards consistency with the purpose and principles of the Resource Management Act, yet is finely balanced.

6.0 ASSESSMENT OF ENVIONMENTAL EFFECTS

Landscape and Visual Amenity

- 6.1 The part of the submission area which is within the Wakatipu Basin Land Use Planning Study has been excluded from consideration.
- 6.2 A landscape assessment was undertaken of the original submission on behalf of QLDC by Dr Marion Read whom comments:

"It would detract significantly from the overarching quality of the ONL which encloses the Wakatipu Basin and would have significant adverse effects on the character and quality of the landscape and on the visual amenity of public and private views. Consequently I consider that the zoning of this part of the site should remain Rural."

"In my opinion the road proposed by the submitter would have significant adverse effects on the ONL from both the Wakatipu Basin side of the landform and also from the Frankton side where the landforms provide an important back drop to urban development."

Traffic

6.3 Mr Jason Bartlett comments on the proposed re-zoning in his evidence where he discusses the transport environment and acknowledges two transport links:

"The site is currently accessed from Tuckers Beach Road. Tucker Beach Road is a Collector Road within the QLDC road network. Tucker Beach Road is a rural road which is accessed from SH6 immediately to the south of the Shotover River Bridge. This road also provides the only road link to Quail Rise.

It is expected that the future road network will include a Collector Road link from Quail Rise through the Frankton Flats North area to the roundabout intersection of SH6 and Hawthorne Drive. There are a number of road proposal in this area including a new link to Hansen Road. At this stage it is not clear if or how this road network will be delivered.

The proposed residential Zone will be able to provide transport links to SH6 via:

- A new road directly from the SH6/Hawthorne Drive Roundabout utilising the 4th approach; and/or
- The existing Tucker Beach Road."
- 6.4 Mr Bartlett concludes that a transport assessment is required

Infrastructure

6.5 A comprehensive assessment has been undertaken and is outlined in the evidence of Mr Chris Hansen. Mr Hansen concludes:

"The proposed re-zoning of the Tucker Beach Residential Area is not considered to have any impacts on the infrastructure network. New infrastructure already exists that can be augmented as required to cater for additional demand.

The infrastructure will be constructed and paid for the by the applicant as the development proceeds. It is anticipated that new infrastructure required would be constructed at little or no cost to QLDC. It is possible that the construction of new infrastructure required for this development could also have a wider network or community benefit by augmenting or providing additional security to existing infrastructure.

The two components of QLDC infrastructure that the development would rely upon on will be the Shotover Waste Water Treatment Plant and the Shotover Country water bore field and treatment plant. Appropriate headworks fees can be levied to mitigate the effects of the additional demand.

Stormwater would be managed for the development on site and is not expected to have any effects on existing infrastructure.

Other non-Council infrastructure and network utilities exist and have capacity to supply this development. Should additional capacity to accommodate the cumulative demand of the residential on the non Council infrastructure be required, it can readily be provided."

6.6 Based upon the evidence of Mr Hansen I conclude that the proposed rezoning can be adequately serviced and no adverse effects upon any existing infrastructure or the environment in this regard have been identified.

Ecology

6.7 A assessment of the ecology within the submission area was undertaken on behalf of QLDC by Mr Glen Davis and the s.42A report concludes:

"Based on the lack of indigenous vegetation communities on the site, Mr Davis does not oppose the rezoning."

Natural Hazards

- 6.8 Land identified by QLDC for Large Lot Residential zoning is identified on the Council's hazard information as comprising of alluvial fan, debris flow and flooding (rainfall) hazards. The s.32 evaluation report submits that "Prior to any further development, potential hazards would be required to be assessed and the hazard mitigated or avoided as required."
- 6.9 By way of comparison, land at 361 Beacon Point Road is proposed by QLDC to be re-zoned from Rural General to Large Lot Residential. This land is an area identified on the Council's hazard register as comprising a LIC 2 'Possibly Moderate' liquefaction risk and is within the flooding return period 75 – 150 year return period. The s.32 evaluation report for this rezone states:

"These hazards are located within other urban areas and any future development should be entitled to the opportunity to undertake design and mitigation investigations."

6.10 I concur with the s.32 evaluation report for Large Lot Residential zoning that hazards can be assessed at the time of subdivision and at this point any mitigation or avoidance of the hazard will provide for the social well being of any future end-resident. Likewise, the development pursuant to the re-zoning now before you.

Economics

6.11 Section 32 Evaluation Reports which support the Strategic Chapters and the Residential Chapters confirm the thrust of the PDP is to intensify existing residential areas whilst providing some additional residential areas

- to satisfy the growing demand for housing as set out in the economic evidence relating to the these Chapters.
- 6.12 I believe the executive summary of Mr Osborne's Economic Evidence towards hearing stream 6 provides an accurate synopsis of the existing residential environment and the intended PDP intensification ambitions. I have paraphrased his summary below:
 - Substantial growth in the residential market;
 - Demand for residential housing rises where a shortfall in 2013 was already at 800 homes;
 - · Housing prices and sales continue to rise;
 - · A highly speculative vacant site market exists;
 - Overall affordability for the District is one of the lowest in the country;
 - By 2045 the District is expected to require 10,000 16,000 new houses to cater for demand:
 - To maintain the growing employment base affordability must be addressed;
 - Issues are not primarily insufficient supply of residential land but development locations and options currently provided by the market;
 - Intensification of residential activity is often accompanied by both economic costs and benefits;
 - There are factors which are likely to mitigate / reduce risks of medium / high density developments;
 - There are economic benefits of intensification;
 - Medium / high density residential options offer significant economic benefits rather than adding to land available;
 - Encouraging medium / high density will improve community well-being and economic viability of the District.
- 6.13 Based upon my 13 years of experience in this District seeking approval for resource consents within existing residential zones in Queenstown I believe that the intensification will not facilitate sufficient housing to meet demand, as insufficient emphasis has been placed on the constraints imposed by gradient or geography of the existing residential areas. In the Wakatipu Basin a majority of centrally located residential areas are located on hillsides. In my opinion this has the following limiting factors:
 - Confines the ability to increase the existing capacity of arterial roads without prohibitive costs.

- Site size is required to be 30%-50% greater to facilitate conventional residential building platforms if seeking to establish between 30-40% of the net site area.
- Building costs are greatly increased on any sloping site.
- Minimum useable outdoor living areas required by District Plan standards are unachievable.
- Provision of two car parking spaces per allotment is difficult in some circumstances and to introduce further residential units and further parking to service is almost always problematic if not implausible.
- Second and third storey levels cannot be achieved without compromising the amenity values on properties downslope of the development site.
- 6.14 I find it noteworthy that affordability and supply of housing are key objectives of SHAs. Nearly all of which are located on flat land located outside Urban Growth Boundaries and those which are being constructed or have recently been completed on land which was actively farmed within the last ten years. None of these are located in existing residential zones.
- 6.15 Land with flat or moderately sloping topography has a higher chance of a comprehensive design creating efficiencies in infrastructure design, flexibility in access and roading alternatives and often enables extensive reserve spaces. Flat unoccupied land facilitates the adequate provision of residential amenities within the site and ensures amenity between the sites.
- 6.16 Land which has been traditionally farmed is outside Urban Growth Boundaries and is more likely than its residential counterpart to afford a 'raw' land value which is considerably lower. A factor which I consider is essential for residential development to offer affordability.

Queenstown-Lakes Housing Accord

- 6.17 QLDC and the Minister for Building and Housing signed an accord on the 23rd of October 2014 which clearly records issues relating to the supply of housing in the District. Four of these are summarised as follows:
 - Housing affordability and an <u>adequate supply</u> are key elements to maintaining a well-functioning, dynamic community with a strong economy.

- Home ownership for many residents of the Queenstown Lakes District is unaffordable contributing to increased pressures on families, communities and government support agencies.
- There is a very <u>high demand for housing based upon projected growth</u> and meeting this demand will require a large number of new dwellings.
- Housing affordability is <u>potentially acting as a constraint on the local</u>
 <u>economy</u> with businesses reporting difficulties attracting and retaining
 staff due to high housing prices.
- 6.18 The Accord seeks to support the Council to address immediate housing issues and agreed targets to be achieved based upon housing projections supplied by Statistics New Zealand and an independent report commissioned by Council which predicted higher population growth than the Statistics New Zealand projections.
- 6.19 74-69% of the target outlined in the Accord will be met providing the seven SHAs approved to date are successful in obtaining resource consent and providing that the development set out in each SHA is fully implemented. However, only three of these approved SHAs have successfully obtained resource consent and only one has reached completion over two years from its conception.
- 6.20 The seven SHAs are expected to provide 74-69% of the Accords target yet 47-52% of this provision lies in residential units within retirement villages. The larger of these offers lease arrangements only and would not appear to promote home ownership. This results in some 33% of the expected housing yield from SHAs that cannot be purchased in longevity.
- 6.21 In summary, I remain dubious about the ability of residential intensification to yield a large supply of housing within the short to medium term which is affordable and addresses the issues raised in Mr Osborne's evidence.
 SHAs should account for an increased supply of housing but to date cannot contribute significantly to addressing the issue of home ownership.
- 6.22 As such, I believe there is a greater demand for the type and location of housing sought by submission #338 and in promoting 1105 residential allotments this is considered to be a positive effect of the proposed rezoning.

National Environmental Standard (NES) for Assessing and Managing Contaminants in Soil to Protect Human Health.

- 6.23 Land pertaining to submission #338 is and has been farmed for generations. Further investigation towards whether land is actually or potentially contaminated within the subject site will be required at the time of any future subdivision consent as a Preliminary Site Investigation (PSI).
- 6.24 In my experience of subdividing former farmland for residential purposes NES considerations relate to the nature and location of potential HAIL activities which are generally associated with activities such as sheep dipping and the storage of pesticides, fertilisers, machinery and/or fuel. The areas in which these activities occur are not widespread but confined and are able to be avoided or remediated to provide land fit for residential purposes.

7.0 Section 32 Evaluation

Section 32A(A)

- 7.1 The submission seeks to re-zone land from Rural to Rural Residential and Low Density Residential. Recommended amendments to Chapter 7 as set out in Appendix 3.
- 7.2 This submission seeks to balance the development outcomes with recognition of the landscape in which the development is situated by providing no build areas over sensitive parts of the development site, promoting a central landscaped corridor with pedestrian and vehicle connectivity for the benefit of existing and future residents.
- 7.3 The land contained in the submission area does not contain any areas of significant ecological importance and is currently considered to be uneconomic for continued pastoral farming activities.

7.4 The proposed residential zones offer housing and this is considered to provide for the communities economic well being and achieves sustainable management.

7.5 Reasonably practicable options are:

- 1 Retain the Rural Zone;
- 2 Re-zone all of the land through the creation of a new Special Zone;
- 3 Re-zone part of the land Rural Lifestyle and part Low Density Residential.

Retain the Rural Zone

7.6 Costs:

- Unlikely to cater for predicted levels of growth.
- Rural Zone objectives and policies will not facilitate residential development.
- An attempt to seek development on the basis of the Rural Zone rules
 would involve a detailed prescription of controls relating to residential
 building platforms to replicate appropriate building design, height and
 landscape controls and significant detail relating to the staging of
 development to sequence the development over the construction
 period.

7.7 Benefits:

Fewer costs resulting in the District Plan Review Process.

Special Zone

7.8 Costs:

- Has costs associated with going through the District Plan Review process.
- Does not achieve the goal for a streamlined District Plan.

7.9 Benefits:

• Enables additional areas that are currently undeveloped to be considered for inclusion in the zone.

 The re-zoning enables diversity of housing options in the District, and makes a positive contribution to the District's economy.

Rural Lifestyle & Low Density Residential

7.10 Costs:

Has costs associated with going through the District Plan Review process

7.11 Benefits:

- Achieves the goal of a streamlined District Plan.
- Provides for a diverse range of residential activities to occur to serve the needs of the community.
- Enables the policy framework to be critically assessed and strengthened where necessary.
- Enables additional areas that are currently undeveloped to be considered for inclusion in the zone.
- The re-zoning enables diversity of housing options in the District, and makes a positive contribution to the District's economy.
- Supports 5(2) of the RMA through ensuring development enables people and communities to provide for their social, economic and cultural wellbeing.
- Supports (in part) the purpose of the RMA through enabling social and economic wellbeing through support for efficient land densities.
- 7.12 The proposed re-zone to Rural Lifestyle & Low Density Residential remains the primary relief sought by submission 328.

8.0 OTHER STATUTORY REQUIREMENTS

- 8.1 A number of requirements remain outstanding in relation to the proposed re-zoning where I consider:
 - There are no relevant management plans or strategies prepared under other Acts;
 - There are no relevant entries on the New Zealand Heritage List/Rārangi Kōrero;
 - There is no relevant planning document recognised by an iwi authority and lodged with the territorial authority, that has a bearing on the

- resource management issues of the land affected by this submission or any land further afield;
- The submission does not give rise to any potential for trade competition.

9.0 FURTHER SUBMISSIONS

- 9.1 Submission #338 received five further submissions
- 9.2 A full set of the further submissions made in respect to the primary submission #338 is contained within Appendix 6 while I provide a summary below with comment:

1 Richard Sperrer

- 9.3 This further submission does not specify whether it opposes or supports Submission #338. The following reasons for the further submission are listed below and comment is provided:
 - a. Effect on the roading;

The potential impact on the roading network has been discussed in Part 6 where it is considered that suitable alternatives exist to accommodate the demand from the proposed re-zoning.

- b. Effect on Lake Johnson;
- c. Effect on nature, breeding areas native birds
- 9.4 Edge Protection Areas (EPA) prevent any built form from the proposed re-zoning being visible from public land around Lake Johnson. The proposed Trail is considered to enable the public to access areas currently held in private ownership without having any detrimental impact upon the qualities of Lake Johnson. The evidence of Mr Hansen confirms storm water runoff is directed by existing topography away from Lake Johnson and any development (which must occur outside the EPA) will not have any adverse effects upon the natural qualities of Lake Johnson.

2 Helga Olliver

9.5 This further submission does not specify whether it opposes or supports Submission #338. The following reasons for the further submission are listed below and comment is provided:

- a. Effects of my views from my house;
- 9.6 While the proposed re-zoning seeks to reduce building height over the Tucker Beach Overlay area it is accepted that the current level of visual amenity enjoyed from the submitters property will be diminished by the proposed re-zoning.
 - b. Effects on the beauty and health of Lake Johnson;
- 9.7 Please refer to comments in (b) & (c) Submitter 1 above.
 - c. Effect of noise and light;
- 9.8 The effects of noise and light upon this property will be limited by the policies contained in Chapter 7. However, it is accepted that the level of acoustic and visual amenity enjoyed from the submitters property will be diminished by the proposed re-zoning.
 - d. Effect on views from across the river.
- 9.9 Adverse effects on the landscape are recorded in Part 6 of my evidence.

3 Jackie Gillies

- 9.10 This further submission opposes Submission #338 and lists the following reasons below and comment is provided:
 - a. Effects on an outstanding natural landscape;
- 9.11 Adverse effects on the landscape are recorded in Part 6 of my evidence.
 - b. Effects on the natural environment of Lake Johnson;
- 9.12 Please refer to comments in (b) & (c) Submitter 1 above.
 - c. Effects on the views of the ice sculpted hills from SH6 of the proposed access road and from the Wakatipu Basin & Coronet Peak;
- 9.13 Adverse effects on the landscape are recorded in Part 6 of my evidence.

4 Otago Regional Council

9.14 With reference to submission #338 the submission summary attached to this further submission states: Numerous submissions either rejecting in part or full discretionary status for subdivision activities. Requests are for controlled activity status to be retained for specific subdivision activities or subdivision activity in general. 9.15 The submission is in opposition to submission #338 and requests: ORC requests the default activity stay as discretionary unless the QLDC is satisfied any change to the notified default activity status is in areas where development is already envisaged and matters such as Natural hazards, Infrastructure, Urban form give effect to the Regional Policy Statement.

Comment:

9.16 The matters raised in Part 5 of the original submission have been resolved as per the subdivision chapter which is attached to the QLDC right-of-reply for Stream 4.

5 H.I.L Limited

- 9.17 This further submission opposes Submission #338 and lists the following reason and comment is provided: *The land the subject of the submission is not suitable for the zoning proposed given its location and characteristics.*
- 9.18 This further submission seeks: That all of the land of the relief sought be declined.

Comment:

9.19 This submission does not elaborate on the location and characteristics that result in the land not being suitable for the zoning proposed. I assume this submission relates to landscape and confirm that adverse effects on the landscape are recorded in Part 6 of my evidence.

6 Hansen Family Partnership

- 9.20 This further submission supports Submission #338 in part and lists the following reasons:
 - a. The submission seeks material changes to land owned by the Hansen Family Trust, and will better enable the efficient and effective use of that land.
 - b. Based on the information currently available and what can be ascertained about the effects of the changes, it is supported.
 - c. However leave is reserved to alter this position, and seek changes to the proposed provisions, after review of further information from the submitter.

9.21 This further submission seeks: Conditional support for allowing the submission, subject to the review of further information that will be required to advance the submission.

Comment:

9.22 This submission appears resolved by filing of further information but no doubt the reservation will not be removed unless amenable to the information. At this point, I am unsure the reasons for this submission can be conclusively addressed.

7 Oasis In the Basin Association

- 9.23 This further submission opposes Submission #338 and lists the following reasons below and comment is provided:
 - a. Lake Johnson has long been considered by the community of Queenstown as a 'Gem' within the Wakatipu Basin. Its idyllic setting in the centre of the Wakatipu Basin, very close to Frankton, creates a wonderful opportunity for the quiet enjoyment of its natural qualities by many residents and visitors. Lake Johnson is home to fish and birds which depend on the unspoiled ecological environment of the lake as well as its immediately surrounding land. Members of the public regularly walk, cycle or drive to the end of (formed) Hansen Road and walk down to Lake Johnson to enjoy its peaceful and natural environment. Development of land adjoining or adjacent to Lake Johnson, as proposed by the submitter, will destroy the amenity and natural characteristics of Lake Johnson which are important to the community and to visitors of the District.
 - b. People who visit Lake Johnson currently engage in a wide range of recreational activities, including walking, fishing, canoeing, swimming, shooting (in season) and just enjoying the peaceful, rural and natural characteristics of this small ice sculpted basin. Visiting Lake Johnson is a pleasant escape from the hustle and bustle of much of the rest of the Wakatipu area. There is significant potential for those recreational opportunities to be enhanced and/or enjoyed by many more people. Residential development surrounding and/or overlooking Lake Johnson would significantly adversely affect those characteristics which make Lake Johnson such an enjoyable and peaceful place to visit.

- 9.24 Please refer to comments in (b) & (c) Submitter 1 above.
 - c. The effects of Low Density Residential zoning and Rural Residential zoning in this area have not been adequately addressed in the submission. Adverse effects which will result will include increased traffic, noise, air, dust and light pollution, degradation of natural character and degradation of ecological habitats.
- 9.25 The potential impact on the roading network has been discussed in Part6 where it is considered that suitable alternatives exist to accommodate the demand from the proposed re-zoning.
- 9.26 The effects of noise and light upon this property will be limited by the policies contained in Chapter 7.
- 9.27 Dust is anticipated to occur only during construction and can be addressed within any future resource consent application and any conditions (if approved).
- 9.28 Air quality will be maintained by Air Standards under the Regional Plan: Air.
- 9.29 In terms of natural character and ecological habitats please refer to comments in (b) & (c) Submitter 1 above.
 - d. Allowing the submission would be contrary to a number of higher order objectives and policies of the Proposed District Plan including (without limitation) many objectives and policies in Chapter 3 (Strategic Direction), Chapter 6 (Landscapes) and Chapter 21 (Rural).
- 9.30 Please refer to Part 5 of my evidence.
 - e. Allowing the submission would be contrary to the purpose and principles of the Resource Management Act 1991.
- 9.31 Please refer to Part 5 of my evidence.

8 Queenstown Airport Corporation

9.32 This further submission opposes Submission #338 and lists the following reason and comment is provided:

- a. QAC is concerned rezoning requests that will result in the intensification of ASAN establishing within close proximity to Queenstown Airport.
- b. The proposed rezoning is a significant departure from the nature, scale and intensity of ASAN development currently anticipated at this site and may potentially result in adverse effects on QAC over the longer term.

Comment:

9.33 The submitters property is located outside the ANB and OCB, consequently I do not recommend accepting this further submission.

10.0 SECTION 42A REPORT

- 10.1 The s.42A report accurately records the comments and conclusions of respective experts.
- 10.2 Paragraph 13.16 & 13.17 comment:

"In a spatial sense, and in the context of the NPS-UDC and significant growth and housing demand experienced within the District, the location of proposed LDRZ does on face value have some merit in terms of connectivity and proximity to services, amenities and existing residential areas. I also note that upgrades are planned to the Quail Rise/SH6 intersection to improve road access to this location, and the submitter identifies an alternative connection to the rear of the proposed MDRZ. The proposed zone could also realise around 1,156 additional dwellings.

However, the provision of housing capacity is not the sole consideration in the application of zoning, and in this instance I consider that Goal 3.2.5 "the protection of our distinctive landscapes from inappropriate development" in combination with Goal 3.2.4 to be of greater comparative significance [CB3]. I am not aware at this point in time of a pressing need to realise this scale of capacity, where realising this is likely to come only with significant costs to the landscape. I believe that such an intensity of development in this location is inappropriate and I therefore reject the areas of proposed LDRZ."

- 10.3 As discussed in part 1 of my evidence the total yield anticipated in the proposed re-zoning is 1105 additional dwellings.
- 10.4 It would appear Ms Banks prefers the Strategic Directions of the PDP over the NPS-UDC. I disagree for the reasons throughout the body of my evidence in relation to the balance of housing demand / requirement for development opportunities to create a healthy residential market against the management of sensitive landscapes.

10.5 Paragraph 13.18 & 13.19 comment:

"In relation to areas of proposed RR zoning, Dr Read identifies that she is supportive of development in this location as having the ability to absorb some level of development, however under a lower density RL zoning having a minimum density of 2 ha. This submission is however opposed from an infrastructure perspective, as no information has been provided about servicing and such zoning is likely to trigger extension to the Council's water supply network which are currently unplanned. This location is also subject to an identified alluvial fan hazard and this has not been addressed within the submission.

As discussed in the Reply for Chapter 27 (Subdivision and Development, [CB18]), Rule 27.5.7 identifies subdivision in the RL zone as a restricted discretionary activity, and access and servicing are listed as matters of discretion. As a restricted discretionary activity the Council also has the ability to decline any consent. I therefore consider that although this submission is opposed from an infrastructure perspective, there is the ability to consider servicing matters at a later date. Therefore in principle, I would be supportive of a RL zoning in this location and I consider this to be within the scope of relief sought as it is for a lower density than the RR sought by the submitter, and also given that the submitter also opposed the Rural zoning over their land generally. However, as there remains some uncertainty about the ability to service this, and a mapped alluvial fan hazard for which no information has been provided by the submitter, I believe it is inappropriate to rezone this area before further information is provided on these matters. I therefore also reject the proposed RR zoning."

10.6 Comments in the later paragraph appear to be based upon Dr Read's assessment. Rural Residential areas are located to the north of the submission area which has been identified in diagrams contained in the s.42A report as being within the WBLUPS area where Dr Read comments:

"A portion of this area (classified RLC in the PDP) has been addressed in the Wakatipu Basin Land Use Planning Study (**WBLUPS**). This area, and parts of submissions relating to this area, are excluded from consideration in this evidence."

10.7 I am unsure whether paragraphs 13.18 & 13.19 are directed towards submission #338.

Nick Geddes

4th June 2017