

Walter Peak Tourism Zone

32AA Assessment

Overview

Section 32AA requires an examination of s32(1)-(3) of the RMA, namely:

- The “extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act” (s32(1)(a))
- Whether “the provisions are the most appropriate way to achieve the objectives by (i) identifying other reasonably practicable options for achieving the objectives; and (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and (iii) summarising the reasons for deciding on the provisions” (s32(1)(b)), and when undertaking this examination must assess: (i) Other reasonably practicable options for achieving the objectives (s32(1)(b)(i)); and (ii) the efficiency and effectiveness of the provisions in achieving the objectives (s32(1)(b)(ii)), And s32A(2)(a) requires this matter to include “identification and assessment of the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for (i) economic growth that are anticipated to be provided or reduced; and (ii) employment that are anticipated to be provided or reduced” s32A(2)(b) requires, “if practicable, quantify the benefits and costs”; and s32A(2)(c) requires, “an assessment of the risk of acting or not acting if there is uncertainty or insufficient information about the subject matter of the provisions”. A summary of the reasons for deciding on the provisions (s32(1)(b)(iii)).
- Relevant objectives and provisions of the PDP Strategic Chapters 3 & 5 (s32(3))

PDP Chapter 3

Chapter 3 sets out the overarching strategic direction for the management of growth, land use and development in a manner that ensures sustainable management of the Queenstown Lakes District’s special qualities:

- a. distinctive lakes, rivers and high-country landscapes free of inappropriate development;
- b. clean air and pristine water;
- c. vibrant and compact town centres;
- d. compact and connected settlements that encourage public transport, biking and walking;
- e. diverse, resilient, inclusive and connected communities;
- f. a district providing a variety of lifestyle choices;
- g. an innovative and diversifying economy based around a strong visitor industry;
- h. a unique and distinctive heritage;
- i. distinctive Ngāi Tahu values, rights and interests;
- j. indigenous biodiversity and ecosystems.

- The above issues lie at the heart of examining the appropriateness of the proposal, with the Strategic provisions in Chapter 3 providing for “an innovative and diversifying economy based around a strong visitor industry” while maintaining and protecting the District’s significant natural and landscape values.
- Chapter 5 relates to Ngai Tahu rights and interests and is applicable to all parts of the District, including identified wāhi tupuna of which adjoin the site: Lake Whakatipu-Wai-māori (which is also a Statutory Acknowledgment Area); and Kā Kamu a Hakitekura (Wāhi tupuna). The proposed provisions are understood to accord with or not offend any provision in Chapter 5. This is on the basis that the proposal adopts the operative regime which has been in effect for nearly three decades and there has never been any known opposition or concern from rununga about the operative regime. Moreover, rununga have not made a submission on the matter.
- Consideration has also been given to the PDP District Wide Chapters. All District Wide Chapters, aside from the Natural Hazard Chapter, include methods applying to the proposed Walter Peak Tourism Zone to implement the District Wide objectives and policies respectively apply. The Natural Hazards affect part of the site. These are well documented and considerable technical investigation has been undertaken to identify natural hazard risk in relation to the site. The proposed amendments include a controlled activity status for all new buildings located on land identified in the Otago Regional Council (ORC) database as being subject to a natural hazard risk. A discretionary regime to implement the objectives and policies set out in Chapter 28 is not required in this particular case, given the thorough understanding and tolerable natural hazard risks affecting the site.

This further evaluation assesses the above matters, but only in relation to the changes that have been made to the proposed zone since the evaluation report for the notified plan provisions.

Appropriateness of the proposed Objective ((s32(1)(a))

Compared to the two notified objectives, having regard to the matters contained in Part 2 and the Strategic Objectives set out below, the proposed Objective is more appropriate because it:

- Better enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety and does not unnecessarily restrict highly valuable land use and development opportunities and commercial investment; better sustains the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; better safeguards the life supporting capacity of air, water, soil, and ecosystems; the efficient use and development of natural and physical resources: better provides for the intrinsic values of ecosystems: better maintains and enhances the quality of the environment:
- Still avoids, remedies, or mitigates adverse effects of activities on the environment; preserves the natural character of the wetlands, and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development: and protects outstanding natural features and landscapes from inappropriate subdivision, use, and development: takes into consideration the finite characteristics of natural and physical resources:

- Is inconsequential regarding the protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna (there are none in the proposed zone): the maintenance and enhancement of public access to and along lakes, and rivers: the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga: the protection of historic heritage from inappropriate subdivision, use, and development: the protection of protected customary rights: the management of significant risks from natural hazards; (a) kaitiakitanga: (aa) the ethic of stewardship: the protection of the habitat of trout and salmon: the effects of climate change: and (j) the benefits to be derived from the use and development of renewable energy; the efficiency of the end use of energy: the maintenance and enhancement of amenity values:
- Will provide more economic and social and cultural improvement opportunities;
- Will provide the same or more environmental improvements and reductions, depending on people's perspectives/opinions regarding appropriate landscape values;
- Will not give rise to any inappropriate or significant environmental costs;
- Regarding landscape, the landscape values associated with the site have changed significantly overtime including progressively over the last two decades with the removal of many mature wilding trees resulting in open space values being dominant. The current landscape character is a coincidental "snapshot in time" and it is not appropriate to expect the current landscape character to remain "frozen in time" without further change given the landowners' long term approach to the improvement of natural values on the site and market demand/incentives to provide a highly attractive world class visitor experience, reliant on the sites relatively remote rural character. Accordingly, the amended proposal does not protect or seek to maintain as-is existing landscape values, but better enables landscape change and improvement that has been long accepted by the community as appropriate for the District. As part of a much larger ONL providing a backdrop, enabling development opportunities at Walter Peak will result in environmental outcomes no different to the high quality and appropriate built and consented development within ONLs around Lake Whakatipu (for example Closeburn, Wilsons Bay, Bobs Cove). For the above reasons allowing built development across the site, accompanied by substantial ecological restoration and amenity planting, can ensure the primary landscape objective of Objective 3.2.5 can be met (i.e., the District's distinctive ONFLs will be retained).

Appropriateness of proposed Policies and Rules to achieve the Objectives (s32(1)(b))

The tables below consider the effectiveness and efficiency of the amended proposal compared to the notified regime. A holistic assessment of the entire proposed Chapter has been taken, rather than an examination of each individual provision.

In summary it is considered that a more enabling bespoke Zone for Walter Peak is more appropriate than the notified regime:

- The ODP and aspects of the s32 Evaluation (p44) already recognise the appropriateness of providing bespoke provisions for the management of Walter Peak, primarily in recognition of its landmark status and long established visitor industry activities, including the site's particular attraction as a destination on the *TSS Earnslaw*.
- The notified regime included a policy and rule framework to contemplate, via a restricted discretionary activity resource consent status, development of jetty/wharf, weather protection features, and infrastructure. These provisions remain unchanged, except that the “water transport overlay” area is more appropriate if it is increased – as there is uncertainties around the location, nature and scale and the functional needs of such potential uses of the water associated with the Zone.

The following tables consider whether the proposed provisions are the most appropriate way to achieve the relevant objectives and strategic policies as compared to the notified provisions by considering the costs and benefits of the proposed provisions and whether they are effective and efficient. For the purpose of this further evaluation, the evaluation is grouped by issue.

It is noted the proposal includes specific amendments, should they be required, to Chapters 3 and 6 to clarify that the Walter Peak Zone is not subject to the landscape policies in Chapter 6. This approach, and the treatment generally of Walter Peak in the proposed zone, is consistent with the Ski Area Sub Zone Framework, which intentionally facilitates the provision of legacy development/tourism zones within the ONL.

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Table 1: Issue – the appropriateness of proposed activities
3.2.1 The development of a prosperous, resilient and equitable economy in the District
3.2.1.1 The significant socioeconomic benefits of well designed and appropriately located visitor industry places, facilities and services are realised across the District.
3.2.1.2 The Queenstown and Wanaka town centres are the hubs of New Zealand’s premier alpine visitor resorts and the District’s economy.
3.2.1.6 Diversification of the District’s economic base and creation of employment opportunities through the development of innovative and sustainable enterprises.
3.2.1.7 Agricultural land uses are enabled provided those uses are consistent with: a. the protection of the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; b. the maintenance of the landscape character of Rural Character Landscapes and the maintenance or enhancement of their visual amenity values; and c. The maintenance of significant nature conservation values.
3.2.1.8 Diversification of land use in rural areas beyond traditional activities including farming is enabled provided that: a) the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected; b) the landscape character of Rural Character Landscapes is maintained and their visual amenity values are maintained or enhanced; and c) significant nature conservation values and Ngai Tahu values, interests and customary resources, are maintained.
3.2.1.9 Infrastructure in the District that is operated, maintained, developed and upgraded efficiently and effectively to meet community needs, in a sustainable way
3.2.3 A quality built environment taking into account the character of individual communities.
3.2.3.1 The District’s important historic heritage values are protected by ensuring development is sympathetic to those values.
3.2.3.2 Built form integrates well with its surrounding urban environment.
3.2.6 The District’s residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.
3.2.6.1 The accessibility needs of the District’s residents and communities to places, services and facilities are met.
3.2.6.2 A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.

3.2.6.3 The contribution that community social, recreational and cultural facilities and activities make to identity and sense of place for residents of the District is recognised and provided for through appropriate location and sound design.

3.3 Strategic Policies Visitor Industry

3.3.1 Make provision for the visitor industry to maintain and enhance attractions, facilities and services within the Queenstown and Wanaka town centre areas and elsewhere within the District's urban areas and settlements at locations where this is consistent with objectives and policies for the relevant zone. (relevant to S.O. 3.2.1.1 and 3.2.1.2).

3.3.1A In Rural areas, provide for commercial recreation and tourism related activities that enable people to access and appreciate the district's landscapes provided that those activities are located and designed and are of a nature that: (a) Protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; and' (b) Maintains the landscape character and maintains or enhances the visual amenity values of Rural Character Landscapes.

3.3.1B Provide for resorts in appropriate locations with particular consideration of adverse cumulative effects.

3.3.20 Enable continuation of existing farming activities and evolving forms of agricultural land use in rural areas except where those activities conflict: (a) protection of the landscape values of Outstanding Natural Features or Outstanding Natural Landscapes; (b) maintenance of the landscape character and maintenance or enhancement of the visual amenity values of Rural Character Landscape; or

3.3.25 Provide for non-residential development with a functional need to locate in the rural environment, through a planning framework that recognises its locational constraints, while ensuring maintenance and enhancement of the rural environment. (relevant to S.O. 3.2.1.8, 3.2.1.9 3.2.5.1 and 3.2.5.2)

3.3.26 That subdivision and / or development be designed in accordance with best practice land use management so as to avoid or minimise adverse effects on the water quality of lakes, rivers and wetlands in the District.

3.3.27 Avoid the planting of identified exotic vegetation with the potential to spread and naturalise unless spread can be acceptably managed for the life of the planting.

3.3.28 Seek opportunities to provide public access to the natural environment at the time of plan change, subdivision or development.

The proposed policies and rules enable development while avoiding, remedying and mitigating adverse effects. For example:

The proposal permits, subject to respective standards: Farming, Farm buildings, Visitor Accommodation, Construction and use of trails, Recreational Activity (including commercial recreation), Commercial activity ancillary to Visitor Accommodation, Commercial Recreation, and Recreational Activities, Residential activity ancillary to Visitor Accommodation, Commercial Recreation, Recreation and Recreational Activities, Informal Airports, Industrial Activity ancillary to, or that supports farming, visitor accommodation, construction of trails, recreation, commercial recreation and informal airports, Structures, facilities, plant, equipment and associated works including earthworks for the protection of people, buildings and infrastructure from natural hazards, Restoration and enhancement of indigenous vegetation, Planting and maintenance of exotic trees and plants excluding wilding exotic trees.

The proposal controls the construction, relocation, addition or alteration of buildings, ensuring Council retains control over key environmental matters such as: The compatibility of the building design, density, scale and location with landscape, cultural and heritage and visual amenity values; b. Landform modification, landscaping and planting; Lighting; Servicing including water supply, fire-fighting, stormwater and wastewater; Natural Hazards; and Design and layout of site access, on-site parking, manoeuvring and traffic generation.

The proposal amends Chapter 30 to allow for small scale wind generation as a controlled activity also.

The proposal provides a discretionary or non-complying consenting pathway for: Buildings within the Building Restriction Area that follows the Lake shore, Buildings within any other Building Restriction Area identified on the Structure Plan, Industrial Activity, Residential Activity not associated with any Visitor Accommodation, Commercial Recreation, Recreation and Recreational Activities, mining, or any other unlisted activity.

The policies, when enacted on discretionary or non-complying activities, promote development anticipated within the zone purposes (namely visitor and transport related activities, and ancillary are generally provided for) and directs that any other development protects or enhances landscape values and nature conservation values.

<i>Benefits</i> ^(b)	<i>Costs</i> ^(b)	<i>Risk Acting/Not Acting</i> ^(c)	<i>Overall Efficiency & Effectiveness</i> ^(a)
<p><u>Environmental</u></p> <p>Increased incentive and capacity for environmental restoration and enhancement opportunities, by reducing consenting and compliance costs thus freeing up investment in natural capital (by tens and possibly hundreds of thousands of dollars if resource consent applications are publicly notified and opposed)</p> <p><u>Economic</u></p> <p>The amended proposal ensures rural visitor activities are enabled in an appropriate location within the district.</p> <p>Considerably improved certainty to the landowner, being one of the largest individual contributors to economic productivity in the District</p> <p>Significant provisions of opportunities for economic growth compared to the notified regime which significantly reduces opportunities for economic growth and investment (by tens of millions of dollars)</p> <p>Significant provisions of opportunities for employment compared to the notified regime which reduces opportunities for employment</p> <p>The amended proposal remains regulated given any new building or development will require resource consent.</p> <p><u>Social & Cultural</u></p> <p>Strengthening/reinforcing the status of Walter Peak's heritage values associated with tourism and as a key tourist attraction</p>	<p><u>Environmental</u></p> <p>Increased risk of adverse effects on landscape and visual amenity effects</p> <p>No other discernible differences compared to the notified RVZ regime</p> <p>Indiscernible cost</p> <p>No or insignificant cost – evidenced in lack of interest / opposition to Wayfare's request to rollover the operative regime</p> <p><u>Economic</u></p> <p>The amended proposal remains regulated given any new building or development will require resource consent.</p> <p><u>Social & Cultural</u></p> <p>No or insignificant cost – evidenced in lack of interest / opposition to Wayfare's request to rollover the operative regime</p> <p>Noting Chapter 36 (Wāhi Tupuna) applies to part of the site</p>	<p>Aside from the actual location, nature and scale of any future wharf/jetty and weather protection developments, there is no uncertainty or insufficient information about the subject matter of the provisions.</p>	<p>The amended proposal facilitates development and activity that has been long established for the District.</p>

Table 2: Issue – ngāi tahu rights values and interests			
3.3.33 Avoid significant adverse effects on wāhi tūpuna within the District.			
3.3.34 Avoid remedy or mitigate other adverse effects on wāhi tūpuna within the District.			
3.3.35 Manage wāhi tūpuna within the District, including taonga species and habitats, in a culturally appropriate manner through early consultation and involvement of relevant iwi or hapū.			
The site is adjoined by two wāhi tapuna (including Lake Whakatipu which is also a Statutory Acknowledgement Area), which have their own regime within the PDP framework unaffected by this amending proposal. The proposal includes specific reference to mana whenua where development within the setbacks for waterbodies are breached.			
<i>Benefits ^(b)</i>	<i>Costs ^(b)</i>	<i>Risk Acting/Not Acting ^(c)</i>	<i>Overall Efficiency & Effectiveness ^(a)</i>
<u>Environmental</u> Nil <u>Economic</u> Reduction in administrative consenting costs / resources <u>Social & Cultural</u> Nil	<u>Environmental</u> Low increase in risk of environmental degradation <u>Economic</u> Nil <u>Social & Cultural</u> Nil	There is no uncertainty or insufficient information about the subject matter of the provisions	The proposal is as effective as the notified regime on the basis that Ngai Tahu are assumed to be generally “comfortable” with the operative regime, or at least with the relief being sought by Wayfare, coupled with the relationship between the landowner and Ngai Tahu which continues to foster.

Table 3: Issue – the effects on heritage values			
3.3.16 Identify heritage items and ensure they are protected from inappropriate development.			
The use of Walter Peak as a visitor attraction carries cultural heritage values and these are appropriately protected by the proposed policies and rules through controlling all building development. The heritage related provisions in this proposal are similar to the notified version.			
<i>Benefits (b)</i>	<i>Costs (b)</i>	<i>Risk Acting/Not Acting (c)</i>	<i>Overall Efficiency & Effectiveness (a)</i>
<u>Environmental</u> Nil / indiscernible <u>Economic</u> Nil / indiscernible <u>Social & Cultural</u> Nil / indiscernible	<u>Environmental</u> Nil / indiscernible <u>Economic</u> Nil / indiscernible <u>Social & Cultural</u> Nil / indiscernible	There is no uncertainty or insufficient information about the subject matter of the provisions.	The amended proposal facilitates a development regime that has demonstrated improvement in cultural heritage, for example through ongoing use and maintenance of the heritage building onsite, and rebuilding of the homestead (which are not listed heritage items).

Table 4: Issue – effects on the natural environment
3.2.4 The distinctive natural environments and ecosystems of the District are protected.
3.2.4.1 Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.
3.2.4.2 The spread of wilding exotic vegetation is avoided.
3.2.4.3 The natural character of the beds and margins of the District’s lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development.
3.2.4.4 The water quality and functions of the District’s lakes, rivers and wetlands are maintained or enhanced.
3.2.4.5 Public access to the natural environment is maintained or enhanced.
3.2.4.6 The values of significant indigenous vegetation and significant habitats of indigenous fauna are protected.
3.2.4.7 The survival chances of rare, endangered, or vulnerable species or indigenous plant or animal communities are maintained or enhanced.
3.3.17 Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas (SNAs) (relevant to S.O. 3.2.1.7, 3.2.1.8, 3.2.4.1, 3.2.4.3 and 3.2.4.4)
3.3.18 Protect SNAs and encourage enhanced indigenous biodiversity outcomes (relevant to S.O. 3.2.1.7, 3.2.1.8, 3.2.4.1, 3.2.1.2, 3.2.4.3 and 3.2.4.4).
3.3.19 Manage subdivision and / or development that may have adverse effects on the natural character and nature conservation values of the District’s lakes, rivers, wetlands and their beds and margins so that their life-supporting capacity is safeguarded; and natural character is maintained or enhanced as far as practicable. (relevant to S.O. 3.2.1.8, 3.2.4.1, 3.2.4.3, 3.2.4.4, 3.2.5.1 and 3.2.5.2)
While there are no SNAs on the site proposal specifically seeks to encourage and enable development that is or supports the restoration or enhancement of natural values, particularly in respect of biodiversity and safeguarding ecosystem services. A specific outcome of the proposed objective is to restore and enhance “nature conservation values”. This outcome is implemented by a specific policy directing the enhancement of “nature conservation values as part of the use and development of the Zone and enable development which is associated with restoration and enhancement of indigenous vegetation”.

<i>Benefits (b)</i>	<i>Costs (b)</i>	<i>Risk Acting/Not Acting (c)</i>	<i>Overall Efficiency & Effectiveness (a)</i>
<p><u>Environmental</u> Opportunities to spend/invest in environmental improvement rather than administrative costs</p> <p><u>Economic</u> Natural capital improvements</p> <p><u>Social & Cultural</u> Indiscernible</p>	<p><u>Environmental</u> Indiscernible. Waterbodies throughout the site remain protected by earthworks provisions.</p> <p><u>Economic</u> Indiscernible</p> <p><u>Social & Cultural</u> Indiscernible</p>	<p>There is no uncertainty or insufficient information about the subject matter of the provisions.</p>	<p>The landowner has a proven record for improving nature conservation values, as evidenced in the substantial restoration and enhancement measures undertaken on the site to date. These measures were undertaken under the operative regime without any regulatory intervention or incentive.</p> <p>Notwithstanding this, the amended proposal requires resource consent for any new building or materially sized scale of development (e.g., earthworks).</p>

Table 5: Issue - landscapes
3.2.5 The retention of the District’s distinctive landscapes - Outstanding Natural Features and Outstanding Natural Landscapes
3.2.5.x The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and landscape capacity are identified.
3.2.5.xxx In locations other than in the Rural Zone, the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected from inappropriate subdivision, use and development.
3.2.5.1A In each Exception Zone located within Outstanding Natural Features and Outstanding Natural Landscapes, any application for subdivision, use and development is provided for: (a) to the extent anticipated by that Exception Zone; and (b) on the basis that any additional subdivision, use and development provided for by that Exception Zone protects landscape values.
3.3.29 Identify the District’s Outstanding Natural Features and Outstanding Natural Landscapes on the District Plan maps.
3.3.29x For Outstanding Natural Features and Outstanding Natural Landscapes. Identify landscape values and landscape capacity: (a) in Schedule 21.22 where applicable and otherwise through assessment processes; and (b) in accordance with the landscape assessment matters in SP [x.x.x.y] and sound landscape assessment methodology.
3.3.30 Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.
3.3.29x Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision. use and development where there is little capacity to absorb change.
The proposal includes numerous policies and rules to encourage appropriate build form and avoid or mitigate adverse effects on landscape and visual amenity values. For example, all building development requires resource consent with matters of control or discretion covering a range of location and design matters, earthworks are generally limited in scale, there is a policy to ensure that any land use or development not otherwise anticipated in the Zone, “protects or enhances landscape values and nature conservation values”, structures within the setback from waterbodies and within the Water Transport Overlay area are restricted discretionary with landscape and amenity values being a matter of discretion.

<i>Benefits (b)</i>	<i>Costs (b)</i>	<i>Risk Acting/Not Acting (c)</i>	<i>Overall Efficiency & Effectiveness (a)</i>
<p><u>Environmental</u> Landscape improvement, particularly in respect of nature conservation values</p> <p><u>Economic</u> Natural capital improvements</p> <p><u>Social & Cultural</u> Improved accessibility to the rural environment and ONLs, and storytelling/exposure regarding cultural heritage values</p>	<p><u>Environmental</u> Increased risk of adverse effects on landscape and visual amenity effects</p> <p>Indiscernible cost</p> <p>No or insignificant cost – evidenced in lack of interest / opposition to Wayfare’s request to rollover the operative regime</p> <p><u>Economic</u> The amended proposal remains regulated given new building or development (including earthworks) of any material scale will require resource consent.</p> <p><u>Social & Cultural</u> No or insignificant cost – evidenced in lack of interest / opposition to Wayfare’s request to rollover the operative regime</p> <p>A SAA (Lake Whakatipu-Wai-māori) and a Wahi Tupuna adjoin the site, and are protected/managed by other provisions in the PDP</p>	<p>There is no uncertainty or insufficient information about the subject matter of the provisions.</p>	<p>The amended proposal is located within a vast ONL and is an exception zone, recognising the historical, long established, and anticipated use of the site for substantial visitor industry development and activity.</p> <p>The anticipated built/developed character of the site has been woven/embedded into the associated use characteristics of the landscape, including when the ONL was first considered. In this regard the anticipated use and development of the site should carry weight when determining conformance with SO3.2.5.1A and “appropriate subdivision, use and development” as provided for in SO3.2.5.xx (locations other than in the Rural Zone).</p>