

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

IN THE MATTER of the Resource
Management Act 1991

AND

IN THE MATTER of Hearing Streams 1 A
and 1 B – Introduction,
Strategic Direction and
Urban Development

**REPLY OF MATTHEW DAVID PAETZ
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL
STRATEGIC DIRECTION AND URBAN DEVELOPMENT CHAPTERS**

7 APRIL 2016

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1. INTRODUCTION

- 1.1 My name is Matthew David Paetz. I prepared the section 42A report for the Strategic Direction and Urban Development chapters of the Proposed District Plan (**PDP**). My qualifications and experience are listed in that s42A report dated 19 February 2016.
- 1.2 Since I prepared my s42A report, I have reviewed the evidence filed by other expert witnesses on behalf of submitters, attended the hearing and been provided with information from submitters and counsel at the hearing, including considering reports of what has taken place at the hearing each day.
- 1.3 I have also entered into expert conferencing on Friday 18 March 2016 with Mr John Kyle and Ms Kirsty O'Sullivan on behalf of the Queenstown Airport Corporation (**QAC**), and Mr Chris Ferguson on behalf of the Hansen Family Partnership,¹ following agreement between the parties and a direction from the Panel that I do this regarding the incorporation of provisions relating to Plan Change 35 (**PC35**) in the Strategic chapters.
- 1.4 The purpose of this right of reply is to provide evidence on specific matters requested by the Panel, to outline a reply to the issues raised by expert witnesses and counsel, and to outline agreements reached through conferencing and further discussions with QAC witnesses. I have focussed on points raised in evidence that I consider justify particular consideration with regards to my professional opinion on matters contained in both Chapters 3 and 4. I have not re-addressed matters that I have already covered in my s42A report, unless I have considered that further comment or explanation is required, or I have changed my recommendation.
- 1.5 This reply evidence covers the following:
- (a) re-drafting of objectives;
 - (b) consideration of the use of 'goals';
 - (c) further recommended changes to definitions;
 - (d) issues related to the Strategic Direction chapter;
 - (e) issues related to the Urban Development chapter; and
 - (f) matters relating to dwelling capacity.

¹ Mr Ferguson's involvement was limited to existing Policies 4.2.2.4, 4.2.3.8, 4.2.4.3, proposed new Objectives 4.2.7 and 4.2.8, and new Policies 4.2.7.1 to 4.2.7.2 and Policies 4.2.8.1 and 4.2.8.2.

1.6 Where I am recommending changes to the provisions as a consequence of the Hearing evidence, I have appended these as **Appendix 1** (recommended Strategic Direction chapter) and **Appendix 2** (recommended Urban Development chapter).

1.7 I have attached in **Appendix 3**, section 32AA evaluation.

2. OBJECTIVES

2.1 During the presentation of the Council's case, the Panel directed that I reconsider the drafting of the objectives in both the Strategic Direction and Urban Development chapters, to ensure the objectives are phrased as a goal or outcome. A working draft of the Strategic Direction chapter was filed on 18 March 2016. I have incorporated the changes set out in that version of the chapter, into my recommended Strategic Direction chapter in **Appendix 1**. There is no specific submission seeking that the objectives be redrafted. However, submissions on specific objectives generally provide scope to make drafting changes to those objectives, and there are submissions such as #243 which, although on the Rural Chapter, states that the drafting of provisions is poor, and that the submission applies to the whole plan.

2.2 It remains my view that the objectives in the Urban Development chapter are already phrased as goals or outcomes, but I accept that there may be other drafting styles or preferences which do not alter the substance or intent of the provisions.

3. GOALS

3.1 The Panel questioned whether the use of the term 'Goals' was appropriate to head each of the seven sections (with accompanying objectives and policies) in Chapter 3. An alternative would be to rename them as objectives, or possibly issues.

3.2 I do not consider that simple 'relabelling' as Issues would be appropriate. The goals are more than the description of an issue, having the aspirational nature of an objective. A further alternative would be to delete the goals, and create a new label or description that defines the issue that each of the seven

groupings of objectives and policies is responding to. I consider this the best alternative, however I maintain my primary view that the use of Goals is both appropriate and desirable.

3.3 I also consider that the use of Goals – as opposed to renaming as objectives – gives greater structural clarity and expression. The use of the term 'Goal' is commonly understood by laypeople. If the goals were relabelled as Objectives, then that would potentially create structural confusion, as there would be objectives sitting under an objective. An alternative could be to label the goals as 'Lead Objectives' or an equivalent wording. I do not consider that this is necessary or desirable, and I note that there is nothing in the RMA preventing the Council from including Goals in the PDP.

3.4 I note that the use of goals is confined to the Strategic Direction chapter. I further note that the use of goals has been well signalled in non-statutory consultation processes, and that they give expression to well accepted key issues in the District. As such, and provided their language is clear (which I consider it is) I foresee no major issues or concerns in terms of the way that the goals will be interpreted or implemented should they become operative.

4. DEFINITIONS

Regionally Significant Infrastructure

4.1 A question arose as to whether the definition of 'Regionally Significant Infrastructure' includes house connections for wastewater or water supply. I do not consider that it does, nor that it should, and I think the definition is sufficiently clear on this. I consider that the collective importance of smaller scale and distributed infrastructure is picked up generally through recommended Objective 3.2.8.1.

4.2 A related question was whether small scale electricity generators should be recognised in the 'Regionally Significant Infrastructure' definition in order to give effect to the National Policy Statement for Renewable Electricity Generation 2011. I do not consider that it follows that because such small scale infrastructure is addressed in the NPS, that such infrastructure is required to be classified as of regional significance to Otago. Small scale renewable energy infrastructure is addressed in zone/district wide chapters of

the PDP, where a more positive and enabling approach is taken as compared to the ODP, reflecting the emphasis of the NPS, and appropriately giving effect to it. I also consider that, because of the scale of that infrastructure and its comparatively small regional importance (even collectively), the zone-specific (or energy and utilities) chapters is an appropriate place to give effect to the NPS.

- 4.3** I consider that this line of questioning alludes to a wider matter or question – at what scale is an infrastructure network or facility considered to be of 'regional significance'? I consider that the answer to that question lies in the scale and significance of the infrastructure, and its systemic influence. It also relates to the scale or nature of impact that a certain form of infrastructure would have in the event of failure.
- 4.4** For example, following this reasoning, a water reservoir might have a scale that is relatively large, and therefore systemic influence in the event of failure. Conversely local water mains or service connections to individual properties, while collectively important, would not be regionally significant. Functional failure would inconvenience some residents, but would usually not be of such town or district wide impact that it would result in impacts of regional significance.
- 4.5** Another example is airports / airfields. The Queenstown and Wanaka Airports are of such scale and significance to tourism (a major economic generator for the Otago region), that they are regionally significant. Other airfields have a role to play in servicing the district and region, however their scale and significance is insufficient to be deemed of regional significance.
- 4.6** For these reasons, I have recommended an amendment to the definition of 'Regionally Significant Infrastructure' (as set out in **Appendix 1**) – so that explicit reference is made to Queenstown and Wanaka airports, rather than designated airports more broadly. I also consider that the reference to 'electricity transmission infrastructure' can be narrowed by giving reference to the National Grid (so that it is clear that local electricity lines are not included).

Urban Development

4.7 Some submitters have also strongly challenged the definition of 'Urban Development' through evidence and in submissions presented at the hearing. The definition of 'urban development' was carried over from the ODP. Its genesis was the Environment Court's decision on Plan Change 30 – Urban Boundary Framework (settled as recently as 2012).² I agree with the concerns with the definition raised by the Hearing Panel and some submitters, and acknowledged by counsel for the Council in openings.

4.8 I have reviewed equivalent definitions used by other authorities. Equivalent definitions appear rare. However, I consider that the definition used in the Proposed Auckland Unitary Plan (**pAUP**) of 'Urban activities' has some potential merit. That definition is as follows:

Urban activities

Activities, including development, that by their scale, intensity, visual character, trip generation and/or design and appearance of structures, are of an urban character typically associated with urban areas.

4.9 Key points of difference or particular factors that need to be considered for the Queenstown Lakes District compared to Auckland and most other regions or districts are:

- (a) the strong presence of a large number of Special Zones outside of urban locations, which sometimes have at least some urban characteristics; and
- (b) the approach taken in rural areas for subdivision where there is no minimum allotment size. This contributes to a degree of subjectivity as to what is 'urban' and what is 'rural'. For example, 'hamlet style' subdivision in the countryside is potentially contemplated in both the ODP and PDP, with lot sizes potentially equivalent to a low density residential development in an urban area. However, this does not imply such development scenarios are necessarily 'urban' in character (and therefore to be discouraged in terms of the policy approach of UGBs and containment promoted by the PDP), as that

2 *Ladies Mile Partnership v Queenstown Lakes District Council* [2012] NZEnvC 44.

will to a significant extent be driven by landscape considerations, and matters such as counterbalancing retention of open space.

- 4.10** As a result, the pAUP definition, if adopted, requires some amendment / augmentation to respond appropriately to the Queenstown Lakes District context. I recommend the notified version of the definition be deleted and replaced with the following definition:

Urban Development

Development that by its scale, intensity, visual character, trip generation and/or design and appearance of structures, is of an urban character typically associated with urban areas. Development in particular Special Zones (namely Millbrook and Waterfall Park) are excluded from the definition.

- 4.11** A potential issue with this recommended definition is that there is an element of subjectivity inherent in it. I considered adding more objective, quantifiable measures to the definition, such as average density, however it is my view that while such options might reduce subjectivity, they raise a number of issues and risks. In particular they risk being arbitrary and they may also risk becoming quasi-rules, noting that a key fundamental approach to subdivision regulation in the ODP which has been carried through to the PDP is the absence of minimum lot sizes for subdivision. The consequence of including a minimum or maximum density or lot size threshold within the definition of 'Urban Development' has the potential to have significant and potentially unintended implications about what nature and scale of development in *rural* areas is considered acceptable.

- 4.12** Therefore, on balance, I consider the proposed definition to be appropriate and a significant improvement on the definition as notified. In addition, to the extent that the term is proposed to be used in Chapters 3 and 4, I consider that it will be able to be clearly interpreted and understood. The revised definition is set out in **Appendix 1**.

Nature Conservation Values

- 4.12** A question was also raised regarding the definition of 'nature conservation values'. I consider there are several issues with this definition. I do not think it

is particularly well defined, and includes active language that reads more as a quasi-policy than as a definition.

- 4.13** I recommend a relatively non-substantive amendment that redrafts the wording to read more appropriately as a definition, which is set out in **Appendix 1** to this Reply. I accept that the use of this definition may be re-considered by the Hearings Panel at subsequent hearings and that further refinements or amendments might be required. In the meantime however, given the widespread use of this terms in Stage 1 notified chapters, it should not in my view be deleted.

5. STRATEGIC DIRECTION CHAPTER

- 5.1** At the hearing the Hearings Panel questioned my recommendation to delete all reference to mapping Urban Growth Boundaries (**UGBs**) and Outstanding Natural Landscapes and Features (**ONLs** and **ONFs**) from the Strategic Direction chapter. More precisely, Policy 3.2.2.1.1 with regard to UGBs, and Policy 3.2.5.1.1 with regard to ONLs and ONFs.
- 5.2** As I stated in my s42A report,³ I considered there was merit in some submissions that argued that there was unnecessary replication between the Strategic Direction and Urban Development chapters. Further, I considered that policies directing these methods were best located in the more specific, Urban Development Chapter.
- 5.3** Having considered this further and reflected on the Panel's questions, given the strategic importance of these policy approaches and methods to the PDP and considering the internal hierarchy of the PDP chapters, I consider that retaining policies requiring the mapping of UGBs and ONLs/ONFs in the Strategic Direction chapter is more appropriate and clearly identifies the importance of this policy approach. The policies should be identified in Chapter 3, given it outlines the strategic direction for the entire District and, as set out in paragraph 8.4 of my s42A report, does sit above the other chapters in Part Two ("Strategy") of the PDP.
- 5.4** I maintain my opinion that the other provisions that I recommended be deleted from the Strategic Direction chapter should remain deleted, deferring to similar

3 At paragraphs 12.69 and 12.70.

provisions in the Urban Development chapter. I note that the provisions recommended to be retained in the Urban Development chapter generally cover the policy themes that were addressed by the policies I recommend to be deleted in the Strategic Direction chapter, however there are small differences in the way the policies are expressed. The one policy that is recommended to be deleted but is not picked up in the Urban Development chapter is Policy 3.2.2.1.6. However, I do not consider this to be problematic. On reflection the PDP provides for effective market competition through its proposed zoning and regulatory approach (more capacity distributed to a greater mix of land owners, with a greater mix of densities) and I do not consider that the policy adds strong direction or value.

- 5.5** The table below summarises how the recommended deleted policies are picked up in the objectives / policies in the Urban Development Chapter (albeit with amendments in some instances).

Recommended deleted Strategic Directions policies	Urban Development objectives / policies
3.2.2.1.2	4.2.2.1
3.2.2.1.3	4.2.1, 4.2.1.2, 4.2.1.3, 4.2.1.4, 4.2.3, 4.2.3.1
3.2.2.1.4	4.2.1.3, 4.2.3.2
3.2.2.1.5	4.2.2.2, 4.2.2.5
3.2.2.1.6	No equivalent
3.2.2.1.7	4.2.1.5, 4.2.1.6

- 5.6** In my s42A report I recommended a new Objective 3.2.1.2 and supporting policies. The Panel sought clarification as to whether the new objective and three policies (that use the words 'Frankton commercial area') are linked to the town centre zone at Frankton only and not something more general. Submitters have also questioned the use of the phrase 'wider Frankton area', and have queried what it means or what area it covers geographically. These are fair points and warrant changes to clarify what is intended.

- 5.7** I can confirm that the intent of the policies was to relate not only to centres zoned commercial such as Remarkables Park and Five Mile, but to all land with commercial/industrial zoning in the Frankton commercial area. The intent being that the Frankton area is viewed as one wider commercial locality

comprising a network of several nodes, with varying functions and scales. This includes, for example, the land at Frankton Corner zoned Local Shopping centre and the proposed expansion of the Local Shopping Centre zoning to the commercial complex on the opposite side of the State Highway incorporating the BP service station. Recommended rewording in **Appendix 1** clarifies and better defines this.

- 5.8** I note that the Expert Conferencing Statement suggested removing, in Policy 3.2.1.2.1, the reference to 'integrated' development of the various mixed use nodes in Frankton. On reflection, I consider that the word should remain, as greater integration between the various centres in Frankton is, in my opinion, a desirable planning outcome and one that, to some extent, is already being considered and facilitated, especially in the area of transport planning.
- 5.9** Orchard Road Holdings (#249) submitted that Three Parks in Wanaka is as significant to Wanaka as Frankton is to Queenstown, and therefore should be recognised in the Strategic Direction chapter under Goal 1 just as Frankton is. Putting aside a detailed analysis and comparison of the function of Three Parks versus Frankton, I consider that the recognition of Three Parks in the Strategic Direction chapter has merit. The commercial area of Three Parks is much smaller than the collective commercial area of Frankton, and in my view of less District-wide strategic significance. However, the function of Three Parks relative to the function of the Wanaka Town Centre can be considered quite similar to the function of Frankton relative to the Queenstown town centre. That is, like Frankton, Three Parks will have a greater focus on servicing the day to day needs of residents, largely through bulky goods / retail offering.
- 5.10** Explicit recognition of Three Parks would embed that centre, Wanaka, Frankton and Queenstown as the four key centres of the District moving forward. This recommended change is addressed in the Section 32AA assessment in **Appendix 3**.
- 5.11** With regard to the Panel's questioning on Objective 3.2.1.7 and policy 3.2.1.7.1 relating to infrastructure and the relationship between the District's infrastructure and regionally significant infrastructure, I note that in conferencing with QAC's planning witnesses I agreed that an eighth goal should be recommended to be added to Chapter 3 that addresses

infrastructure. Not only was structural change proposed, but there was also recommended rewording of provisions.

5.12 Since that time, Mr Craig Barr, Senior Planner at Council, prepared evidence in response to the expert conferencing statement and QAC presented supplementary evidence at the hearing. Representatives of QAC have since met with Council representatives and provided Council with possible revised provisions for Chapter 4.

5.13 I consider that, generally speaking, the further revised provisions from QAC for Chapter 4 address many of Mr Barr's valid comments and concerns. I have recommended that many of them be adopted and they are included in the recommended chapter in **Appendix 2** to this Reply.

5.14 In terms of Chapter 3 however, as I outline below, upon further reconsideration of all relevant material before the Panel, my considered view is not the same as that outlined in the Expert Conferencing Statement which, I understand, continues to be QAC's position.

5.15 I have carefully reconsidered one objective and associated policy, that were shown as Objective 3.2.8.1 and Policy 3.2.8.1.2 in the Expert Conferencing Statement. Following the concerns raised by Mr Barr and questions raised by the panel at the re-convened hearing on 31 March 2016, QAC has made some suggested changes, which are shown below:

Objective – Recognise that the functional or operational requirements of regionally ~~or nationally~~ significant infrastructure can necessitate a particular location.

Policy – ~~Where practicable, m~~ Mitigate the impacts of ~~nationally or~~ regionally significant infrastructure on outstanding natural landscapes and outstanding natural features where practicable.

5.16 I consider that the intent of the provisions is clear, and quite understandable. Regionally significant infrastructure that is important or even critical for community wellbeing may at times need to be considered in outstanding natural landscapes and features. Section 6 of the RMA sets a high bar in terms of the protection of outstanding natural landscapes and features, and

whilst this bar is generally appropriate for most development, QAC is effectively arguing that the bar needs to be lowered somewhat for regionally significant infrastructure given its wide community benefit.

- 5.17** I initially agreed with this approach in the Expert Conferencing Statement, seeing the balancing intention sought. However, having had the benefit of more time to consider wider ramifications and assess the additional evidence filed, I consider that these provisions have flaws and that the balance is too far in favour of enabling infrastructure in these locations. In particular, the proposed policy only requires mitigation of the impacts of regionally significant infrastructure on ONLs and ONFs, which I consider is a lower standard compared to what Section 6(b) of the RMA requires: 'protection' of these landscapes and features from inappropriate subdivision, use and development.⁴ Depending on the circumstance (what is proposed, and the landscape within which a proposal sits), mitigation, especially with the qualifier 'where practicable', will not be likely to allow the Council to fulfil its functions in terms of section 6(a) and (b) of the RMA to preserve the natural character of wetlands, and lakes and rivers, and the 'protection, of ONF/ONL from inappropriate subdivision, use and development.
- 5.18** In addition, while I could possibly support the recognition of locational constraints and an enabling approach towards existing infrastructure in such locations (for example, for upgrading, repair or maintenance of existing infrastructure), the policy would apply to both existing and new infrastructure and, given the wording of section 6(b) of the RMA, would be too enabling of the latter.
- 5.19** I consider that changes to other provisions heighten the status generally given to infrastructure in the District, and that together with the recommended change to Objective 3.2.5.1 that adds the qualifying word 'inappropriate', some rebalancing is provided without going too far in prioritising infrastructure relative to the protection of ONLs and ONFs.
- 5.20** I have responded to Panel questions about the definition of 'Regionally Significant Infrastructure' in section 4 above.

⁴ On this issue, I now agree that the qualifier "inappropriate" is required in Objective 3.2.5.1 regarding subdivision, use and development.

- 5.21** In terms of questions from the Panel relating to Objective 3.2.4.4 – wilding trees, I agree that the management of wilding trees relates to more than nature conservation values, as expressed in the objective as notified. For example, there are wider impacts on landscape values, farming, and tourism. These will be addressed in more detail at the hearing on the Wilding Trees chapter. I recommend that additional matters are added to the Objective to address the fact that the policy approach is promoted to address more issues than just nature conservation values.
- 5.22** With regard to Objective 3.2.5.1, the Panel in questions suggested that a possible way of giving relief to submitters would be to express flexibility to allow effects on less important qualities of ONLs and ONFs.
- 5.23** I have reflected on this comment but overall I consider it important for the Objective's protective aspirations to remain, noting there could be opportunity in lower order chapters for impacts on the less important qualities of ONLs/ONFs to be contemplated. Inclusion of the word 'inappropriate', as I noted earlier, enables applicants to make their case on the merits in terms of whether adverse impacts on ONFs or ONLs, including component parts of them, is justified.
- 5.24** Whilst I accept that the objective essentially parrots section 6(b) of the RMA (something the Council has been very keen to avoid in the PDP), I fail to see a valid alternative that:
- (a) emphasises this critical objective for the District; and
 - (b) at the same time provides the necessary 'caveat' which is achieved by the word 'inappropriate', which ensures the objective does not seek to protect these landscapes and features from all development.
- 5.25** At the hearing the question was asked as to whether the use of the words 'maintain and enhance' contradicts the use of the words 'managed and low impact change', in Objective 3.2.5.2 in relation to the Rural Landscape Classification. I do not necessarily view the two limbs of this objective to be contradictory, but I acknowledge there is probably some tension or at least ambiguity and that better wording could be achieved – and is therefore recommended as set out in the recommended Revised Chapter in **Appendix 1**.

5.26 Several submitters have ongoing concerns with Objective 3.2.5.5. I have considered these concerns and have recommended alternative wording that seeks to retain the intent of the objective, whilst providing for greater breadth and flexibility in its meaning and application. In my view, the recommended changes included in **Appendix 1** are the most appropriate.

5.27 The New Zealand Fire Service (#438) have filed legal submissions noting that I did not give reasons for my recommendation to reject that an additional objective should be included in the chapter, as follows:

Provision for comprehensive emergency services throughout the city, including for their necessary access to properties and the water required for firefighting.

5.28 I consider that this objective is too fine grained for a strategically focussed chapter and is better addressed in the lower order chapters.

6. URBAN DEVELOPMENT CHAPTER

6.1 A question was posed by the Panel as to whether the purpose section at the start of the Urban Development chapter could be relabelled to 'Issues'. I do not consider this necessary, nor something required by the RMA. I favour the title 'Purpose', as I think it is more positive, and relates to the wording content, which is more around identifying the purpose of the chapter and the provisions as opposed to identification of issues.

6.2 The Panel has heard evidence from urban design expert Mr Clinton Bird, that a transition (rather than an abrupt change) between urban and rural areas is desirable. The question arose as to whether this transition should best occur on the urban side of the UGB boundaries or on the rural side. Mr Bird's opinion was that the transition should occur on the urban side, and I concur (particularly in light of the updated capacity analysis that I have undertaken). An amendment to the provisions is recommended to promote this. The amendment constitutes additional words to Policy 4.2.3.7, as follows (shown underlined):

The edges of Urban Growth Boundaries are managed to provide a sensitive transition to rural areas, with the transition addressed within Urban Growth Boundaries.

- 6.3** The Queenstown Lakes Community Housing Trust (#88) submitted generally in support of the use of UGBs and urban intensification, however requested that in Arrowtown the UGB should be extended so as to incorporate some land on Jopp Street that could be developed for community housing. This matter is better addressed in the mapping hearing stream when the precise locations of UGBs are being addressed.
- 6.4** The NZ Transport Agency (#719) submitted that some amendments should be made to the Urban Development chapter. These generally relate to wording amendments, which NZTA consider will lead to great emphasis on land use – transport integration, efficiency in the use of infrastructure and so forth. I consider that the requested changes are improvements on the provisions and I recommend them to the Hearing Panel. A section 32AA assessment is attached in **Appendix 3**.

Changes relating to QAC

- 6.5** Following conferencing with representatives of QAC, and further communications and consideration, I have finalised recommendations within Chapter 4 on objectives and policies specific to QAC's interests, as set out in **Appendix 2**.
- 6.6** I recommend new objectives and policies, that sit under a 'Queenstown Airport' heading in the chapter. The previously recommended new objective and policy (4.2.7 and 4.2.8 in the s42A version of the chapter) have been deleted. These provisions provide the framework for PC35 at a strategic level. The PC35 provisions found in the lower order chapters then provide the detail/specificity required to achieve these outcomes (rather than duplication between chapter 4 and the lower order chapters, which is undesirable). I consider that an appropriate balance has been struck in these recommended changes. That is, they provide a strategic framework to manage the important issues associated with the use of the airport and potential land use conflicts (most particularly reverse sensitivity issues).
- 6.7** Objective 4.2.5 and the two related policies are all derived (verbatim) from the Environment Court confirmed provisions of PC35, specifically Objective 7 and Policies 7.1 and 7.2 of Section 4.9.3 District Wide – Urban Growth. I note that Policy 7.3 of PC35 reflects conditions that are inherent in QAC's designation.

Objective 4.2.6 is also derived (verbatim) from the Environment Court confirmed provisions of PC35, specifically Objective 8. Policy 4.2.6.1 is derived from PC35, however consolidates Policies 8.1 to 8.3, Section 4.9.3 of PC35 into one policy. It also removes the specificity of Policies 8.1 to 8.3, whilst continuing to provide guidance around the land use management responses that may be observed in the lower order chapters.

6.8 In addition to the above, it is imperative that this policy (or the Environment Court confirmed Policies 8.1 to 8.3) remains in the Strategic Directions chapter as:

- (a) At a strategic level, it provides the policy required to "prohibit" ASAN within specified zones/noise boundaries in lower order chapters;
- (b) It sets out the management response for zones that are not included in Stage 1 of the District Plan Review (such as the Remarkables Park Zone and Frankton Flats A and B Zone). Furthermore, the Frankton Flats A Zone does not include any objectives or policies. This further reiterates why it is important to include such high level provisions in this chapter, particularly give the restrictions around ASANs in this zone; and
- (c) PC35 included a policy around reverse sensitivity in the District Wide and Low Density Residential Zone provisions (Policy 8.1, Section 4.9.3 and Objective 5, Section 7.2.3 respectively. Rather than repeating this policy in the Low Density Residential Zone and the Local Shopping Centre Zone, it has been included in Chapter 3.

6.9 Policy 4.2.6.2 is derived from PC35, however seeks to consolidate Policy 8.4 and 8.5 of PC35 to ensure it maintains a higher level focus appropriate for this chapter. The specific detail around how to achieve this policy is set out in the lower order chapters. I consider it imperative this this policy remains for reasons set out in paragraph 6.8 above.

Purpose of UGBs

6.10 Questioning from the Panel has also focussed on, or alluded to, what the central resource management purpose of UGBs is. I reiterate that I see several key purposes to UGBs:

- (a) As an urban form structuring tool: that is, UGBs define 'the where' of urban development into the future (and the rules in the various zones define the 'how much' – the temporal element, 'the when', can be estimated but not defined). They provide a clear signal to the community, developers and infrastructure providers ('hard' – such as roading, and 'soft', such as schooling) where development will occur, with the zoning provisions providing the 'how much' (or at least the '*potential* how much'). As Mr Glasner's evidence confirmed, infrastructure forward planning and funding becomes more challenging if there is less certainty where urban development may occur;
- (b) They reinforce more of a planned approach to resource management, as opposed to one that is a more *ad hoc* and treats proposals (ie, plan changes, resource consent applications) on their merits but which risks losing sight of the 'bigger picture'. I believe their use as part of a planning approach is supported by section 31 of the RMA, in terms of 'integrated management'; and
- (c) They provide another layer of landscape protection (in its wider sense), to complement the landscape provisions and controls in the Landscape, Rural and Subdivision chapters.

6.11 These urban form / design, landscape and infrastructure benefits have been addressed in the evidence of Mr Bird, Dr Read and Mr Glasner respectively.

6.12 As acknowledged in the section 32 analysis, the implementation of UGBs can potentially generate negative impacts on housing affordability. However, in this case such impacts are considered to be mitigated by the fact that a substantial dwelling capacity is enabled within the UGBs, a capacity that is well above the demand projected by population growth (noting that this potential capacity is not considered excessive - as I have stressed previously, capacity 'fat' is necessary).

6.13 Related to this, submitters have raised questions around what is considered to be inconsistent application of UGBs for Rural Residential and Special Zones. In particular, that the Jacks Point Special Zone is located within the proposed UGB, but Millbrook / Waterfall Park is not.

- 6.14** There are several factors that explain these differences. Firstly, Plan Change 29 (Arrowtown Boundary) addressed the matter of the Urban Growth Boundary in Arrowtown. As this was recently litigated and resolved through the Environment Court, it was considered that the matter should not be re-litigated through the PDP. This is one reason why Millbrook / Waterfall Park, which are typically considered to be within the Arrowtown catchment (in terms of housing market), were not included within the UGB in the PDP.
- 6.15** A second, more substantive reason is that the Millbrook and Waterfall Park Special Zones are not considered to demonstrate characteristics fully typical of urban development, although I note that this can be a 'grey area' in terms of distinction. Arguably, the Waterfall Park Special Zone enables a potential form of development closer to 'Urban Development' (with a total zoned area of 120,609 m², and development rights of 100 dwellings, that equates to an average density of 1 dwelling per 1206 m²).
- 6.16** Other factors should however be considered, and I do not consider a small 'island' of urban intensity development within a small self-contained UGB 'ring' to be consistent with the concept of UGBs and their use in growth management planning. I would further add that the Waterfall Park Special Zone represents the sort of sporadic and *ad hoc* urban intensity zoning in the middle of the countryside that Council is looking to discourage through the PDP. As such, I have recommended its exclusion from the definition of Urban Development, and while it does not need to be determined at this point, my recommendation would be that it not be included within a UGB.
- 6.17** In terms of Millbrook, although there are clusters of urban-type densities within the site, the appearance of the site through retention of large areas of open space, and the design approach adopted across the site, makes it 'look and feel' rural. Additionally the average density of potential development at Millbrook is much lower than Waterfall Park (ie. one dwelling per 6000 m²). Overall, applying the recommended 'urban development' definition, it is my opinion that Millbrook does not, overall, display characteristics of urban development.
- 6.18** By contrast, the Jacks Point Special Zone is included within the proposed UGBs. In my opinion, its ultimate form is clearly different compared to Millbrook. Its scale could ultimately reach thousands of dwellings, much larger

than Millbrook. Under the PDP there are potentially significant areas of medium density development. Whilst large areas of open space are located within the zone, it is characterised by large areas of housing within the open space, as opposed to Millbrook where there are relatively small clusters of housing. It is also foreseeable (and indeed contemplated by the zoning) that Jacks Point will have more mixed use development, and potentially an educational facility at some point, all of which are urban features or characteristics. I maintain my opinion that Jacks Point should remain within the UGB.

7. DWELLING CAPACITY OF PDP

- 7.1** I assisted the Council in preparing its response to the Panel's request for information dated 18 March 2016, in particular the information in Schedule 1 of the Council's response relating to additional dwelling capacity enabled by the PDP (**RFI**). Page 7 of Schedule 1 records that, based on a high level desk-top analysis the PDP is estimated to enable between 20,000 to 22,000 additional dwellings within the urban area of the District (ie, that area defined by the proposed UGBs). This same figure was presented in my summary of evidence at the hearing.
- 7.2** It is not stated in the RFI, but the PDP provides capacity for some 3,000 to 5,000 additional dwellings over and above the capacity of approximately 17,000 currently enabled by the ODP (this includes the capacity of 1,500 dwellings at the Northlake Special Zone, which was not factored into the Dwelling Capacity Model revision in 2015, as the plan change was proceeding through an Environment Court appeal at that time).
- 7.3** The information provided through the RFI was high level by virtue of time available to provide it in response to Panel directions. Since that time, I have collated the information provided and summarised it in one place, in order to assist the Panel through this Reply. The findings confirm a figure of 21,973 (17,000⁵ + 4,973⁶) dwellings that are enabled within the proposed UGBs. This is very close to the upper range of 22,000 as set out in the RFI.

⁵ Dwelling capacity of the ODP plus the 1,500 dwelling capacity enabled by the Northlake Special Zone which was recently made operative.

⁶ Additional capacity enabled by zone and rule changes in the PDP.

Areas / zones where additional capacity is enabled by the PDP

7.4 The Council's Dwelling Capacity Model estimates that under the ODP there is capacity for around 15,000 dwellings in the District's urban areas. Northlake in Wanaka, as approved by the Environment Court, will add capacity for an additional 1,500 dwellings.

7.5 Additional urban dwelling capacity is enabled in the PDP through the following avenues:

High Density Residential Zone

7.6 Significantly more enabling development controls are proposed in the PDP compared to the ODP within this zone. Of particular note:

- (a) the Maximum building height is increased from 2 storeys to 3-4 storeys in Queenstown. The height limit remains at 2 storeys in Wanaka; and
- (b) the height in relation to boundary control is significantly liberalised from 2.5m and 25 degrees, to 2.5m and 45 degrees (or 55 degrees for the northern boundary of a site).

Mixed Use Zone

7.7 Currently called the Business Zone in the ODP, this zone is proposed to be amended to a Mixed Use Zone, at locations in Gorge Road (Queenstown) and Anderson Heights (Wanaka). Both sites are centrally located relative to the town centres.

7.8 The maximum height limits are 6 storeys in Queenstown, and 3 storeys in Wanaka. This is a significant change from the 3 storeys and 2 storeys respectively enabled in the Operative District Plan.

7.9 Unlike the ODP, the PDP actively promotes residential development in the Mixed Use Zone.

Medium Density Zone

7.10 This is a new zone proposed in the following 'brownfield' locations:

- (a) Fernhill;
- (b) Central Queenstown;

- (c) Arrowtown; and
- (d) Central Wanaka.

7.11 Two 'greenfield' locations are also proposed:

- (a) Northern side of SH6, Frankton; and
- (b) Scurr Heights: a Council owned site in Wanaka (currently on the market).

7.12 All of these areas, except for the land on the northern side of SH6 Frankton (which is currently zoned General Rural) are currently zoned Low Density Residential. The proposed upzoning enables significantly more dwelling capacity primarily through increasing density.

Low Density Residential Zone

7.13 Key proposed changes that increase dwelling capacity within the Low Density Residential Zone are:

- (a) Relatively significant additional areas of greenfield land in Wanaka are proposed to be rezoned as Low Density Residential; and
- (b) The introduction of a new proposed rule (7.5.2.3) more readily provides for 'low scale' infill housing development, by enabling the potential for a second dwelling on sections less than 900 square metres (at present sections must be larger than 900 square metres to accommodate a second dwelling in the Low Density Zone).

The additional estimated dwelling capacity enabled, by zone

7.14 The following comprises an estimate of realistic capacity. Realistic capacity does not assume the development potential will be taken up. A full re-running of the Dwelling Capacity Model should in my view be undertaken to reach a more 'scientific' estimate. However, I consider that the following estimate provides a reasonable general estimate.

High Density Residential Zone

7.15 Previously, the Dwelling Capacity Model assumed 100% development feasibility for this zone. This is fully theoretical, and not realistic. In 2015 I reviewed the assumptions underpinning the capacity in this zone, with the assistance of Insight Economics, who prepared a report.⁷

⁷ Insight Economics: Medium To High Density Housing Study: Stage 1b – Dwelling Capacity Model Review.

7.16 The feasibility was brought down to 10%, which is a product of the application of a number of 'discount factors', the most prominent being:

- (a) The predominance of visitor accommodation land use activity in the zone;
- (b) A significant percentage of properties having a 'Capital Improvement to Land Value' ratio that is considered generally unfavourable for redevelopment, even assuming a 15 year timeframe where all things being equal, land values should increase relative to capital improvement value; and
- (c) Assumptions around 'passive tenure' – ie. a significant number of property owners will wish to hold their properties, without redeveloping, either as owner occupiers or investors.

7.17 The land area⁸ of the zone is 1,315,534m². 10%⁹ of this figure is 131,555m². Assuming a density of one residential unit per 115m² of site area¹⁰ this equates to capacity of 1,144 dwellings. This is an additional 887 dwellings over and above the capacity of 257 under the ODP.

Mixed Use Zone

7.18 The land area for this zone is 212,048m². Over a 15 year timeframe, I have assumed 40% of this land area could be realistically contemplated for residential redevelopment.

7.19 This equates to a land area of 84,819m², or 8.48ha.

7.20 In Queenstown, the PDP enables a height of six storeys. However, based on my experience with medium and high density residential policy development and development feasibility, I anticipate that an average height of 4 storeys is more realistic, assuming there will be some 3 storey development, and the occasional 5/6 storey development. In Wanaka, the PDP enables a height of 3 storeys. I anticipate that most redevelopment will be 3 storeys in height, although there is likely to be some 2 storey development.

<http://www.qldc.govt.nz/assets/Uploads/Planning/District-Plan/District-Plan-Review-2015-s32-Links/Urban-Environment/HDR/Attachment-4-Insight-Economics-Housing-Demand-Study-Stage-1b-FINALb-2.pdf>

⁸ All land areas referred to in this summary have been provided by Council's GIS team.

⁹ 10% being the final feasibility factor recommended in Insight Economics' report.

¹⁰ The denser side of 2 storey development typically achieves densities of around 1 unit / 150 square metres of site area. The denser side of 3 storey development typically achieves densities of around 1 unit / 80 square metres I have averaged the two. Although the PDP potentially enables 4 storey development in Queenstown, the situations where this achievable are likely to be relatively rare, due to the need for large sites which are not commonly available.

7.21 Given these assumptions, I have assumed a density of 100 dwellings per hectare, which I consider to be typical of 3/4 storey apartment development. This equates to a total of 848 dwellings (8.48ha x 100).

Medium Density Zone

7.22 Firstly, the two greenfield sites comprise a combined land area of 338,290m². As per Insight Economic's report, assuming a net developable area comprising 72% of this land area leaves 243,569m². I assume a density of one dwelling per 325 square metres¹¹. This provides a capacity of 749 dwellings_(243,569 divided by 325).

7.23 For the brownfield locations, the land area is 828,268m². As per the Insight Economics Report, I assume 28% of this land area is realistically developable. This equates to a land area of 231,915m². Assuming the 15% discounting typically required from gross land area in smaller scale infill redevelopment, this leaves 197,128m². Assuming a density of one dwelling per 275 square metres¹² this provides a capacity of 717 dwellings_(197,128 divided by 275).

Low Density Residential Zone

7.24 In terms of the low impact infill density rule in the PDP, I assume for the purposes of this exercise that it will usually enable 1 additional dwelling on a site. This is due to the fact that different rules apply to the larger sites that may realise more yield.

7.25 I have assumed a higher uptake of the opportunity in Wanaka, compared to Queenstown, due to the fact that there are a much larger number of larger (800-1100m²) sites in Wanaka compared to Queenstown, which will more readily enable this form of development. However the rates are still low as:

- (a) Sites under 600 square metres cannot utilise this development opportunity;
- (b) Even many sites that are 600-800 square metres in area will not be able to utilise this development opportunity due to placement of the

¹¹ The PDP's minimum allotment size for the zone is 250m². However, this is a minimum area and I consider comprehensive development in these areas will also comprises some slightly larger sites. Hence an average density assumption of 1/325.

¹² As above, the minimum lot size is 250 square metres but there will be sites where this density cannot be maximized. However in brownfield infill scenarios the average densities are likely to be higher than in greenfield settings, hence an average density of 1/275 rather than 1/325.

existing house on the site, topography, or value of the capital improvement on the site relative to land value; and

(c) Passive tenure.

7.26 Therefore I have assumed realistic redevelopment of 20% of existing sites in Wanaka, and 10% of existing sites in Queenstown.

7.27 As there are 3801 existing sites in the LDR zone in Wanaka, 20% of this number equates to 760 sites. Therefore the additional capacity is 760 dwellings.

7.28 As there are 5261 existing sites in the LDR zone in Queenstown, 10% of this number equates to 526 sites, therefore the additional capacity is 526 dwellings.

7.29 The PDP proposes to rezone 337,656m² of land zoned Rural General under the ODP as LDR in the PDP. Assuming 72% (based on the LDR feasibility stated in the Insight Economics report) of this land is developable, and assuming an average density of 1 dwelling per 500 m² of land area¹³, the additional capacity is 486 dwellings.

Summary

7.30 The table below summarises the additional 'realistic' capacity enabled by the PDP over and above the ODP, in urban areas:

Zone	ODP Capacity	PDP Capacity	Additional Capacity (over and above ODP-enabled capacity)
High Density Residential			887
Mixed Use			848
Medium Density Residential			1466
Low Density Residential			1772
TOTAL			4,973

¹³ As per the Medium Density Zone, the minimum lot size is 400 m², however comprehensive development is likely to typically include a significant number of properties in the 600 – 800 m² range.

7.31 I stand by my original opinion that more than sufficient dwelling capacity is enabled by the PDP to cater for projected demand for housing over the next 15 years. I reiterate again that we have taken a realistic approach to capacity, rather than a theoretical one, and applied significant 'discounts' to capacity to account for a range of potential development barriers.



Matthew Paetz

7 April 2016

APPENDIX 1

Recommended Chapter 3 – Strategic Direction

Key:

Chapter version: Reply dated 07/04/2016

- Black underlined text for additions and ~~strikethrough text~~ for deletions shows recommended changes to notified chapters, in version attached to s42A report, dated 19 February 2016.

- Further changes shown in red underlined text for additions and ~~strike-through text~~ for deletions reflect further changes recommended to chapter in Reply.

3 Strategic Direction

3.1 Purpose

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

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

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

3.2 Goals, Objectives and Policies

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

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

Policies

3.2.1.1.1 Provide a planning framework for the Queenstown and Wanaka ~~central business areas~~ town centres that enables quality development and enhancement of the centres as the

STRATEGIC DIRECTION 3

key commercial, civic and cultural hubs of the District, building on their existing functions and strengths.

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

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

3.2.1.2 ~~Objective – Recognise, develop, sustain and integrate the~~ The key mixed use function of the wider Frankton commercial area, is enhanced, with better transport and urban design integration between comprising Remarkables Park, Queenstown Airport, and Five Mile and Frankton Corner.

Policies

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

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

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

3.2.1.2.4 Recognise that Queenstown Airport makes an essential contribution to the prosperity and economic resilience of the District.

3.2.1.3 Objective – The key function of the commercial core of the Three Parks Special Zone is sustained and enhanced, with a focus on large format retail development.

Policies

3.2.1.3.1 Provide a planning framework for the Commercial Core of the Three Parks Special Zone to enable large format retail development.

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

Policies

3.2.1.3A.1 Avoid commercial rezoning that would ~~fundamentally~~ undermine the key local service and employment function role that the ~~larger urban~~ centres outside Queenstown, and Wanaka central business areas and Frankton fulfil.

3.2.1.3A.2 Reinforce and support the role that township commercial precincts and local shopping centres fulfil in serving local needs.

3.2.1.3A.3 Avoid non-industrial activities not related to or supporting industrial activities occurring within areas zoned for Industrial activities.

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3.2.1.4 ~~Objective – Recognise and provide for~~ The significant socioeconomic benefits of tourism activities across the District are provided for and enabled.

Policy

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

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

Policies

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

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

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

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

Policies

~~Safeguard the efficient and effective operation of regionally significant infrastructure from new incompatible activities. [Drafting note – the objective and policy relating to infrastructure have been relocated/amended under new Goal 8.]~~

3.2.2 **Goal - The strategic and integrated management of urban growth**

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

- ~~to that~~ promotes s a compact, well designed and integrated urban form;
- ~~to that~~ manages s the cost of Council infrastructure; and
- ~~to that~~ protects s the District's rural landscapes from sporadic and sprawling development.

Policies

3.2.2.1.1 Apply Urban Growth Boundaries (UGBs) around the urban areas in the Wakatipu Basin (including Jacks Point), Arrowtown and Wanaka. [Drafting note – this policy, which was deleted in 6 March version, is reinstated]

3.2.2.1.2 ~~Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs.~~

3.2.2.1.3 ~~Manage the form of urban development within the UGBs ensuring:~~

- ~~Connectivity and integration with existing urban development;~~
- ~~Sustainable provision of Council infrastructure; and~~

STRATEGIC DIRECTION 3

- ~~Facilitation of an efficient transport network, with particular regard to integration with public and active transport systems~~

3.2.2.1.4 ~~Encourage a higher density of residential development in locations close to town centres, local shopping zones, activity centres, public transport routes and non-vehicular trails.~~

3.2.2.1.5 ~~Ensure UGBs contain sufficient suitably zoned land to provide for future growth and a diversity of housing choice.~~

3.2.2.1.6 ~~Ensure that zoning enables effective market competition through distribution of potential housing supply across a large number and range of ownerships, to reduce the incentive for land banking in order to address housing supply and affordability.~~

3.2.2.1.7 ~~That further urban development of the District's small rural settlements be located within and immediately adjoining those settlements.~~

3.2.2.2 Objective - ~~Manage d~~ Development in areas affected by natural hazards is appropriately managed.

Policies

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

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

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

Policies

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

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

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

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

Policies

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

3.2.4 Goal - The protection of our natural environment and ecosystems

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

STRATEGIC DIRECTION 3

3.2.4.2 Objective – Protection of areas with significant Nature Conservation Values.

Policies

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

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

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

Policies

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

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

Policies

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

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

Policies

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

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

Policies

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

3.2.4.7 Objective - Facilitate public access to the natural environment.

Policies

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

3.2.4.8 Objective - Respond positively to Climate Change.

Policies

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

STRATEGIC DIRECTION 3

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

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

Policies

3.2.5.1.1 ~~Identify the district's Outstanding Natural Landscapes and Outstanding Natural Features on the District Plan maps,~~ and protect them from the adverse effects of subdivision and development. **[Drafting note – the first part of this policy, which was deleted in 6 March version, is reinstated]**

3.2.5.2 Objective - ~~Minimise the adverse landscape effects of subdivision, use or development in specified Rural Landscapes.~~ ~~Maintain and enhance the landscape character of the Rural Landscape Classification.~~ ~~The quality and visual amenity values of the Rural Landscapes are maintained and enhanced, whilst acknowledging the potential for managed and low impact change.~~

Policies

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

3.2.5.3 Objective - ~~Direct n~~ **New** urban subdivision, use or development ~~to~~ **will** occur in those areas which have potential to absorb change without detracting from landscape and visual amenity values.

Policies

3.2.5.3.1 ~~Direct urban development to be within Urban Growth Boundaries (UGB's) where these apply, or within the existing rural townships.~~ **Urban development will be enabled within Urban Growth Boundaries and discouraged outside them.**

3.2.5.4 Objective - ~~Recognise there is a~~ **The** finite capacity ~~for residential activity in~~ **of** rural areas ~~to absorb residential development is considered so as to protect~~ **if** the qualities of our landscapes ~~are to be maintained.~~

Policies

3.2.5.4.1 Give careful consideration to cumulative effects in terms of character and environmental impact when considering residential activity in rural areas.

3.2.5.4.2 Provide for rural living opportunities in appropriate locations.

3.2.5.5 Objective - ~~Recognise that agricultural land use is fundamental to the character of our landscapes.~~ ~~The character of the district's landscapes is maintained by ongoing agricultural land use and land management.~~

Policies

3.2.5.5.1 ~~Give preference to~~ **Enable** farming activity in rural areas except where it conflicts with significant nature conservation values.

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

STRATEGIC DIRECTION 3

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

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

Policies

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

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

3.2.6.2 Objective - ~~Ensure a-A~~ mix of housing opportunities is realised.

Policies

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

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

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

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

Policies

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

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

3.2.6.4 Objective - ~~Ensure planning and development maximises opportunities to create s~~Safe and healthy communities through good quality subdivision and building design.

Policies

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

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

3.2.7 Goal - Council will act in accordance with the principles of the Treaty of Waitangi and in partnership with Ngai Tahu.

3.2.7.1 Objective - ~~Recognise and p~~Provide for ~~Protect~~ Ngai Tahu values, rights and interests, including taonga species and habitats, and wahi tupuna.

3.2.7.2 Objective - Enable the expression of kaitiakitanga by providing for meaningful collaboration with Ngai Tahu. ~~in resource management decision making and implementation.~~

3.2.8 Goal – Provide for the ongoing operation and provision of infrastructure

3.2.8.1 Objective - Maintain and promote the efficient and effective operation, maintenance, development and upgrading of the District's existing infrastructure and the provision of new infrastructure to provide for community wellbeing.

STRATEGIC DIRECTION 3

Policies

- 3.2.8.1.1 Ensure that the efficient and effective operation of infrastructure is safeguarded and not compromised by incompatible development.

RECOMMENDED CHANGES TO DEFINITIONS (IN CHAPTER 2)

New definition of Regionally Significant Infrastructure

Regionally significant infrastructure means:

- a) Renewable electricity generation facilities, where they supply the National Grid and local distribution network and are operated by an electricity operator ; and
- b) Electricity transmission infrastructure forming the National Grid; and
- c) Telecommunication and radio communication facilities; and
- d) Key centralised Council infrastructure, including water reservoirs, and wastewater treatment plants; and
- e) Roads classified as being of national or regional importance; and
- f) Queenstown and Wanaka airports ~~Designated airports.~~

Delete the notified definition of Urban Development and replace with:

Urban Development

Development that by its scale, intensity, visual character, trip generation and/or design and appearance of structures, is of an urban character typically associated with urban areas. Development in particular Special Zones (namely Millbrook and Waterfall Park) is excluded from the definition.

Amend the notified definition of Nature Conservation Values as follows:

~~Means the preservation and protection of the natural resources of the District having regard to their~~
The collective and interconnected intrinsic values, ~~and having special regard to~~ of indigenous flora and fauna, natural ecosystems, and landscape.

APPENDIX 2

Recommended Chapter 4 – Urban Development

URBAN DEVELOPMENT 4

Key:

Chapter version: Reply dated 07/04/2016

- Black underlined text for additions and ~~strike through text~~ for deletions shows recommended changes to notified chapters, in version attached to s42A report, dated 19 February 2016.

- Further changes shown in red underlined text for additions and ~~strike through text~~ for deletions reflect further changes recommended to chapter in Reply.

4 URBAN DEVELOPMENT

4.1 Purpose

The purpose of this Chapter is to set out the objectives and policies for managing the spatial location and layout of urban development within the District. This chapter forms part of the strategic intentions of this District Plan and will guide planning and decision making for the District's major urban settlements and smaller urban townships. This chapter does not address site or location specific physical aspects of urban development (such as built form) - reference to zone and District wide chapters is required for these matters.

The District experiences considerable growth pressures. Urban growth within the District occurs within an environment that is revered for its natural amenity values, and the District relies, in large part for its social and economic wellbeing on the quality of the landscape, open spaces and environmental image. If not properly controlled, urban growth can result in adverse effects on the quality of the built environment, with flow on effects to the impression and enjoyment of the District by residents and visitors. Uncontrolled urban development can result in the fragmentation of rural land; and poses risks of urban sprawl, disconnected urban settlements and a poorly coordinated infrastructure network. The roading network of the District is under some pressure and more low density residential development located remote from employment and service centres has the potential to exacerbate such problems.

The objectives and policies for Urban Development provide a framework for a managed approach to urban development that utilises land and resources in an efficient manner, and preserves and enhances natural amenity values. The approach seeks to achieve integration between land use, transportation, services, open space networks, community facilities and education; and increases the viability and vibrancy of urban areas.

Urban Growth Boundaries are established for the key urban centres of Queenstown, Wanaka and Arrowtown, providing a tool to manage anticipated growth while protecting the individual roles, heritage and character of these areas. Specific policy is provided for these areas, including provision for increased density to contribute to a more compact and connected urban form.

4.2 Objectives and Policies

4.2.1 Objective - Urban development is coordinated integrated with infrastructure and services and is undertaken in a manner that protects the environment, rural amenity and outstanding natural landscapes and features.

Policies

4.2.1.1 Land within ~~and adjacent to~~ the major urban settlements will provide the focus for urban development, with a lesser extent accommodated within smaller rural townships.

4.2.1.2 Urban development is integrated with existing public infrastructure, and is designed and located in a manner consistent with the capacity of existing networks.

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- 4.2.1.3 Encourage a higher density of residential development in locations that have convenient access to public transport routes, cycleways or are in close proximity to community and education facilities.
- 4.2.1.4 Development enhances connections to public recreation facilities, reserves, open space and active transport networks.
- 4.2.1.5 Urban development is contained within or ~~immediately adjacent to~~ existing settlements.
- 4.2.1.6 Avoid sporadic urban development that would adversely affect the natural environment, rural amenity or landscape values; the efficiency and functionality of infrastructure; or compromise the viability of a nearby township.
- 4.2.1.7 Urban development is located so as to maintains the productive potential and soil resource of rural land.
- 4.2.2 Objective - Urban Growth Boundaries are established as a tool to manage the growth of major centres within distinct and defensible urban edges.**

Policies

- 4.2.2.1 Urban Growth Boundaries define the limits of urban growth, ensuring that urban development is contained within those identified boundaries, and urban development is avoided outside of those identified boundaries.
- 4.2.2.2 Urban Growth Boundaries are of a scale and form which is consistent with the anticipated demand for urban development over the planning period, and the appropriateness of the land to accommodate growth.
- 4.2.2.3 Within Urban Growth Boundaries, land is allocated into various zones which are reflective of the appropriate land use.
- 4.2.2.4 Not all land within Urban Growth Boundaries will be suitable for urban development or intensification, such as (but not limited to) land with ecological, heritage or landscape significance; ~~or~~ land subject to natural. The form and location of urban development shall take account of site specific features or constraints to protect public health and safety.
- 4.2.2.5 Urban Growth Boundaries may need to be reviewed and amended over time to address changing community needs.
- 4.2.3 Objective – Within Urban Growth Boundaries, provide for a compact and integrated urban form that limits the lateral spread of urban areas, and maximises the efficiency of infrastructure operation and provision.**

Policies

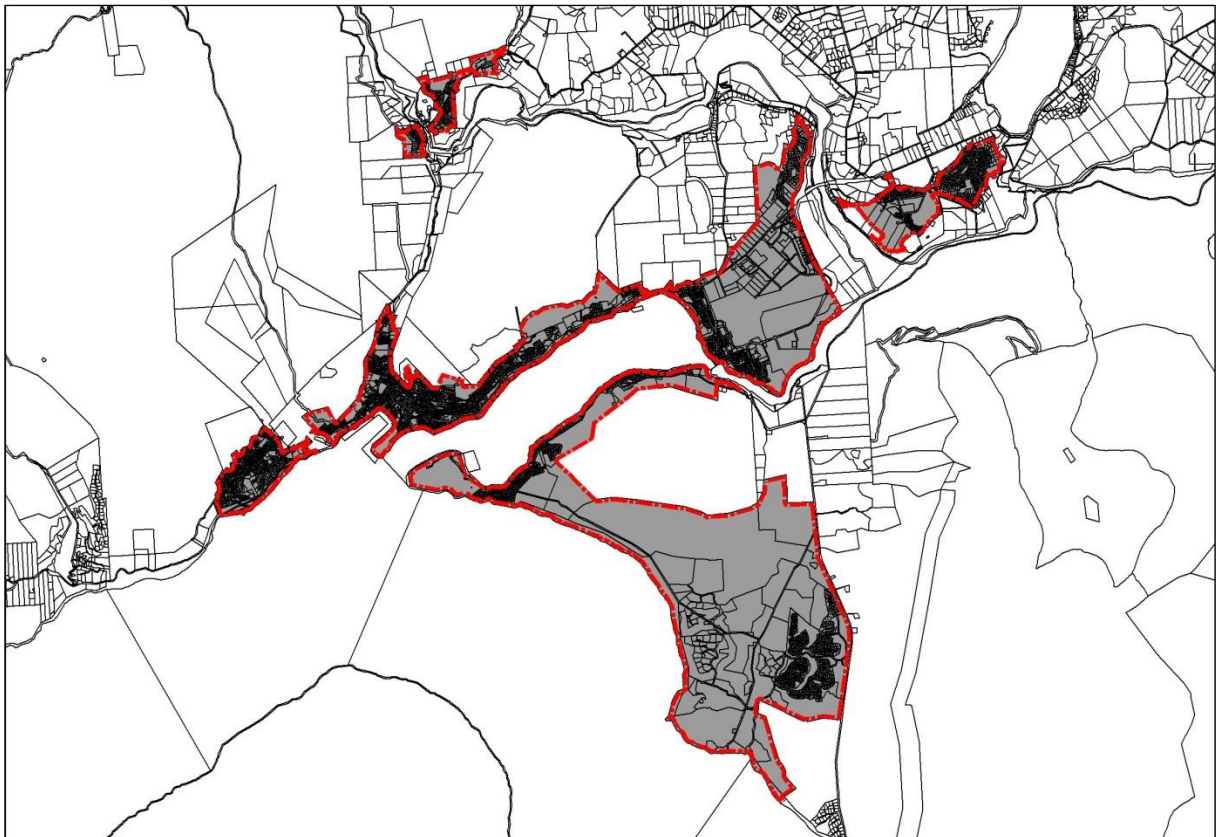
- 4.2.3.1 Provide for a compact urban form that utilises land and infrastructure in an efficient and sustainable manner, ensuring:
- connectivity and integration;
 - the sustainable use of public infrastructure;
 - convenient linkages to the public and active transport network; and
 - housing development does not compromise opportunities for commercial or community facilities in close proximity to centres.
- 4.2.3.2 Enable an increased density of residential development in close proximity to town centres, public transport routes, community and education facilities.

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- 4.2.3.3 ~~Low density development does not compromise opportunities for future urban development~~
- 4.2.3.4 Urban development occurs in locations that are adequately serviced by existing public infrastructure, or where infrastructure can be efficiently upgraded.
- 4.2.3.5 For urban centres where Urban Growth Boundaries apply, new public infrastructure networks are limited exclusively to land within defined Urban Growth Boundaries.
- 4.2.3.6 Development improves connections to recreational and community facilities, and enhances the amenity and vibrancy of urban areas.
- 4.2.3.7 The edges of Urban Growth Boundaries are managed to provide a sensitive transition to rural areas, with the transition addressed within Urban Growth Boundaries.
- 4.2.3.8 Land use within the Air Noise Boundary or Outer Control Boundary of the Queenstown Airport is managed to prohibit or limit the establishment of Activities Sensitive to Aircraft Noise.

Queenstown

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



Policies

- 4.2.4.1 Limit the spatial growth of Queenstown so that:
- the natural environment is protected from encroachment by urban development
 - sprawling of residential settlements into rural areas is avoided
 - residential settlements become better connected through the coordinated delivery of infrastructure and community facilities

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- land use and transport networks are integrated and the viability of public and active transport is improved
- the provision of infrastructure occurs in a logical and sequenced manner
- the role of Queenstown Town Centre as a key tourism and employment hub is strengthened
- the role of Frankton in providing local commercial and industrial services is strengthened

4.2.4.2 Ensure that development within the Queenstown Urban Growth Boundary:

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

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

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

Queenstown Airport

4.2.5 Objective - Maintain and promote the efficient operation of Queenstown Airport and set appropriate noise limits in order to protect airport operations and to manage the adverse effects of aircraft noise on any Activity Sensitive to Aircraft Noise.

4.2.5.1 To ensure appropriate noise boundaries are established and maintained to enable operations at Queenstown Airport to continue and to expand over time.

4.2.5.2 To manage the adverse effects of noise from aircraft on any Activity Sensitive to Aircraft Noise within the airport noise boundaries whilst at the same time providing for the efficient operation of Queenstown Airport.

4.2.6 Objective - Manage urban growth issues on land in proximity to Queenstown Airport to ensure that the operational capacity and integrity of the Airport is not significantly compromised.

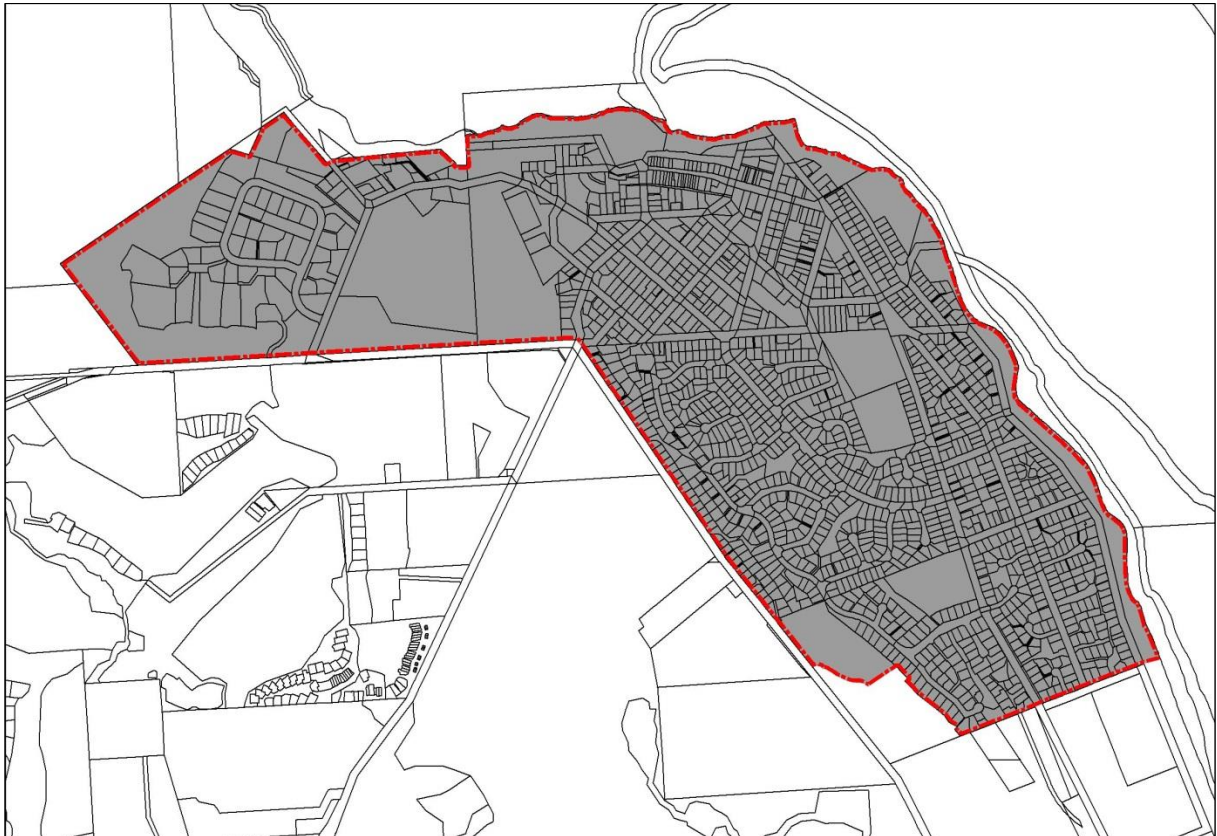
4.2.6.1 To protect the airport from reverse sensitivity effects of Activity Sensitive to Aircraft Noise via a range of zoning methods, including where appropriate the use of prohibited activity status.

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- 4.2.6.2 Ensure that Critical Listening Environments of all new and alterations and additions to existing buildings containing Activity Sensitive to Aircraft Noise within the Queenstown Airport Air Noise Boundary or Outer Control Boundary are designed and built to achieve appropriate Indoor Design Sound Levels.

Arrowtown

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



Policies

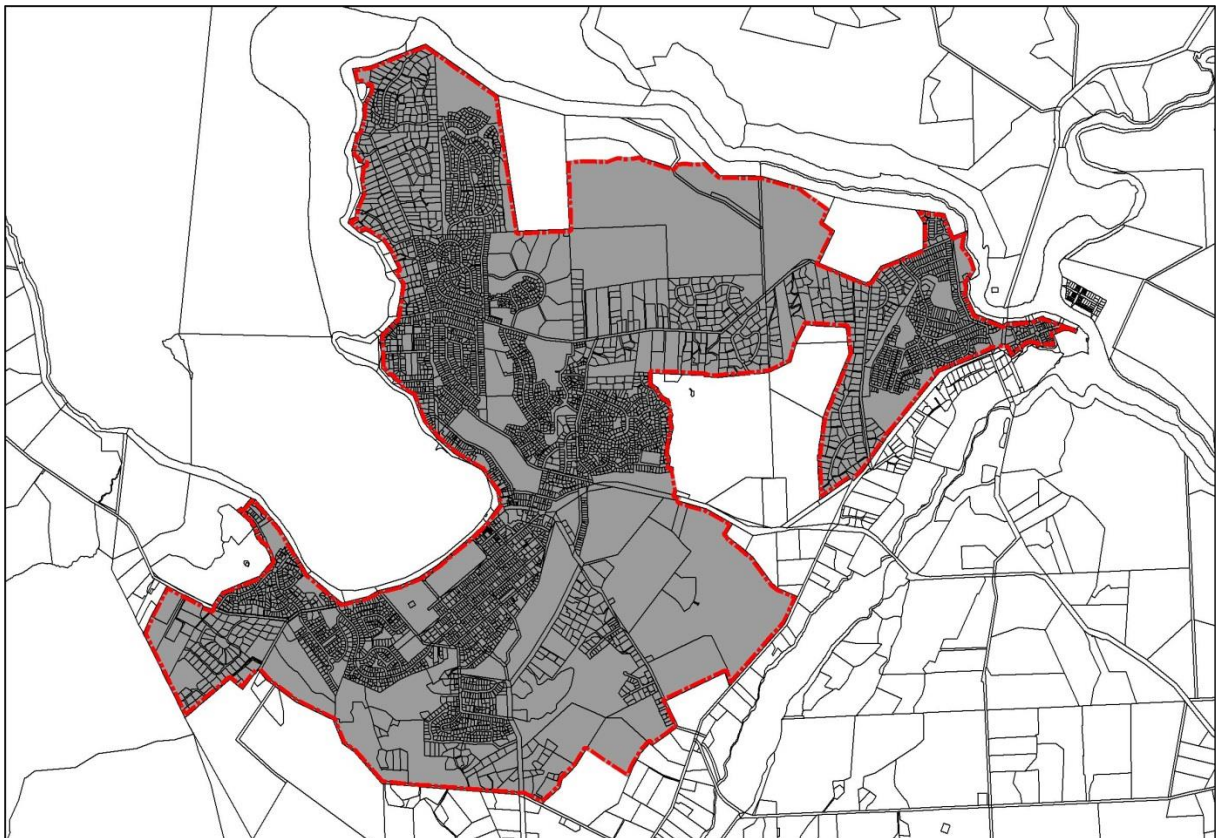
- 4.2.7.1 Limit the spatial growth of Arrowtown so that:
- Adverse effects of development outside the Arrowtown Urban Growth Boundary are avoided.
 - the character and identity of the settlement, and its setting within the landscape is preserved or enhanced.
- 4.2.7.2 Ensure that development within the Arrowtown Urban Growth Boundary provides:
- an urban form that is sympathetic to the character of Arrowtown, including its scale, density, layout and legibility in accordance with the *Arrowtown Design Guidelines 2006* (and any adopted updates).
 - opportunity for sensitively designed medium density infill development in a contained area closer to the town centre, so as to provide more housing diversity and choice and to help reduce future pressure for urban development adjacent or close to Arrowtown's Urban Growth Boundary.

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- a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowtown
- for Feehley's Hill and land along the margins of Bush Creek and the Arrow River to be retained as reserve areas as part of Arrowtown's recreation and amenity resource.
- To recognise for the importance of the open space pattern that is created by the inter-connections between the golf courses and other Rural General land

Wanaka

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



Policies

4.2.8.1 Limit the spatial growth of Wanaka so that:

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

4.2.8.2 Ensure that development within the Wanaka Urban Growth Boundary:

- Supports increased density through greenfield and infill development, in appropriate locations, to avoid sprawling into surrounding rural areas

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

~~4.2.7 Objective – Maintain and promote the efficient operation of Queenstown Airport and set appropriate noise limits in order to protect airport operations and to manage the adverse effects of aircraft noise on any Activity Sensitive to Aircraft Noise.~~

~~Policies~~

~~4.2.7.1 To ensure appropriate noise boundaries are established and maintained to enable operations at Queenstown Airport to continue and to expand over time.~~

~~4.2.7.2 To manage the adverse effects of noise from aircraft on any Activity Sensitive to Aircraft Noise within the airport noise boundaries whilst at the same time providing for the efficient operation of Queenstown Airport.~~

~~4.2.8 Objective – Manage urban growth issues on land in proximity to Queenstown Airport to ensure that the operational capacity and integrity of the Airport is not significantly compromised now or in the future.~~

~~Policies~~

~~4.2.8.1 To protect the airport from reverse sensitivity effects of Activity Sensitive to Aircraft Noise via a range of zoning methods, including where appropriate the use of prohibited activity status.~~

~~4.2.8.2 Ensure that Critical Listening Environments of all new and alterations and additions to existing buildings containing Activity Sensitive to Aircraft Noise within the Queenstown Airport Air Noise Boundary or Outer Control Boundary are designed and built to achieve appropriate Indoor Design Sound Levels.~~

APPENDIX 3

Section 32AA evaluation

CHAPTER 3 – STRATEGIC DIRECTIONS - AMENDMENTS AND SECTION 32AA EVALUATION OF AMENDMENTS RECOMMENDED SINCE THE SECTION 42A REPORT WAS PREPARED

Note: A Section 32AA Evaluation was undertaken and submitted for the recommended changes agreed to in Expert Conferencing between Queenstown Airport’s Planners John Kyle and Kirsty O’Sullivan, and Council’s Planner Matthew Paetz. This evaluation does not repeat that. The assessment only focuses on more substantive recommended through my reply. As the Conferencing Statement in respect of Chapter 4 has largely been included in the provisions, that section 32AA assessment is not repeated here.

Proposed Provisions (as per the Section 42A report, dated 19 th February 2016)	Proposed Provisions (deleted text struck through, added text underlined) following Hearing.	General Comments and the appropriateness of achieving the purpose of the Act / purpose of the Objective		
<p>Objective 3.2.1.1 Recognise, develop and sustain the Queenstown and Wanaka central business areas as the hubs of New Zealand’s premier alpine resorts and the District’s economy.</p>	<p>Objective 3.2.1.1 Recognise, develop and sustain the <u>The Queenstown and Wanaka central business areas town centres are</u> the hubs of New Zealand’s premier alpine resorts and the District’s economy.</p> <p>New additional Objective 3.2.1.3 <u>The key function of the commercial core of the Three Parks Special Zone is sustained and enhanced, with a focus on large format retail development.</u></p> <p>New additional Policy 3.2.1.3.1 <u>Provide a planning framework for the Commercial Core of the Three Parks Special Zone to enable large format retail development.</u></p>	<ul style="list-style-type: none"> Objective 3.2.1.1 has been redrafted to read more as an objective. ‘Town centres’ is considered a more appropriate term than ‘central business areas’. Objective 3.2.1.1 achieves the purpose of the Act by promoting the wellbeing of people and communities through strengthening the key hubs of the District. Section 7(b) of the Act requires particular regard to be had to the efficient use and development of natural and physical resources. Focusing development on existing hubs and building on their strengths is consistent with this. New objective 3.2.1.3 gives effect to the submission of Orchard Holdings. It is considered that the role of the commercial centre at Three Parks is worthy of strategic recognition. This will help enhance its role in Wanaka, providing for the wellbeing of people and communities. New policy 3.2.1.3.1 gives effect to Objective 3.2.1.3. 		
		Environmental, Cultural, Economic, Social and Cultural Benefits	Environmental, Economic, Social and Cultural Costs	Effectiveness & Efficiency
		<ul style="list-style-type: none"> The new policies support and reinforce the important role of the commercial centre at Three Parks. This provides strategic level support for the centre that complements and builds upon the zone provisions. 		<ul style="list-style-type: none"> The proposed policies give effect to the objective through two effective approaches: enabling the centre, and seeking to prevent further commercial rezoning that undermines it.

<p>Objective 3.2.1.7</p> <p>Recognise the potential for rural areas to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests.</p>	<p>Objective 3.2.1.7</p> <p>Recognise the potential for Diversification of land use in rural areas providing to diversify their land use beyond the strong productive value of farming, provided a sensitive approach is taken to providing adverse effects on rural amenity, landscape character, healthy ecosystems, and Ngai Tahu values, rights and interests are avoided, remedied or mitigated.</p>	<p>General Comments and the appropriateness of achieving the purpose of the Act / purpose of the Objective</p>		
<ul style="list-style-type: none"> Objective 3.2.1.7 has been reworded to retain the policy focus on diversification but to avoid reference to farming, and also to change the expression of language. Reference to an effects-based assessment more directly ties to the purpose of the RMA as opposed to the use of the language 'sensitive approach' 		<p>Environmental, Cultural, Economic, Social and Cultural Benefits</p>	<p>Environmental, Economic, Social and Cultural Costs</p>	<p>Effectiveness & Efficiency</p>
<p>N/A</p>		<p>N/A</p>	<p>N/A</p>	<p>N/A</p>
<p>Objective 3.2.4.4</p> <p>Avoid the spread of wilding exotic vegetation to protect conservation values.</p>	<p>Objective 3.2.4.4</p> <p>Avoid the spread of wilding exotic vegetation to protect nature conservation values, landscape values and the productive potential of land.</p>	<p>General Comments and the appropriateness of achieving the purpose of the Act / purpose of the Objective</p>		
<ul style="list-style-type: none"> The spread of wilding exotic vegetation has impacts that are wider than impacts on nature conservations values, hence the widening of the objective. The revised objective is more appropriate to achieve the purpose of the Act as it better reflects the impacts the spread of wilding exotic vegetation can have on other matters recognised in Part II of the RMA, including landscape values. 		<p>Environmental, Cultural, Economic, Social and Cultural Benefits</p>	<p>Environmental, Economic, Social and Cultural Costs</p>	<p>Effectiveness & Efficiency</p>
<p>N/A</p>		<p>N/A</p>	<p>N/A</p>	<p>N/A</p>

Proposed Provisions (as per the Section 42A report, dated 19 th February 2016)	Proposed Provisions (deleted text struck through added text underlined) as agreed during expert witness conferencing held 18 th March 2016.	General Comments and the appropriateness of achieving the purpose of the Act / purpose of the Objective		
<p>Objective 3.2.5.2</p> <p>Maintain and enhance the landscape character of the Rural Landscape Classification whilst acknowledging the potential for managed and low impact change.</p>	<p>Objective 3.2.5.2</p> <p>Maintain and enhance the landscape character of the Rural Landscape Classification whilst acknowledging the potential for managed and low impact change.</p> <p><u>The quality and visual amenity values of the Rural Landscapes are maintained and enhanced.</u></p>	<ul style="list-style-type: none"> The objective has been written to read more as an objective. It has also been simplified. It has moved away from a primary focus on landscape character, to a broader focus on quality and visual amenity values, which better reflects Part II of the RMA's focus on the quality of the environment and amenity values under Section 7 of the Act. 		
		Environmental, Cultural, Economic, Social and Cultural Benefits	Environmental, Economic, Social and Cultural Costs	Effectiveness & Efficiency
		N/A	N/A	N/A
<p>Objective 3.2.5.4</p> <p>Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscapes are to be maintained.</p>	<p>Objective 3.2.5.4</p> <p>Recognise there is a finite capacity for residential activity in rural areas if the qualities of our landscapes are to be maintained.</p> <p><u>The finite capacity for residential activity in rural areas to absorb residential development is considered so as to protect if the qualities of our landscapes are to be maintained.</u></p>	<ul style="list-style-type: none"> The objective has been written to read more as an objective. It better focusses the objective around the issue that it is seeking to address – the cumulative effects of residential development on landscape qualities in rural areas. 		
		Environmental, Cultural, Economic, Social and Cultural Benefits	Environmental, Economic, Social and Cultural Costs	Effectiveness & Efficiency
		N/A	N/A	N/A
<p>Objective 3.2.5.5</p> <p>Recognise that agricultural land use is fundamental to the character of our landscapes.</p>	<p>Objective 3.2.5.5</p> <p>Recognise that agricultural land use is fundamental to the character of our landscapes.</p> <p><u>The character of the district's landscapes is maintained by ongoing agricultural land use and land management.</u></p>	<ul style="list-style-type: none"> The objective has been written to read more as an objective. The revised objective better reflects the fact that not only does productive farming play an important role in maintaining the character of the landscape, but so does non- agricultural and non-productive use of the land based around land management practices that share approaches with agricultural land use. The objective therefore better reflects the existing and evolving land use reality, and therefore better reflects the purpose of the RMA for the District. 		
		Environmental, Cultural, Economic, Social and Cultural Benefits	Environmental, Economic, Social and Cultural Costs	Effectiveness & Efficiency
		N/A	N/A	N/A