

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

UNDER THE Resource Management Act 1991 ("**Act**")

IN THE MATTER OF Stage 3b Proposed District Plan – Rural Visitor
Zone

BETWEEN **GIBBSTON VALLEY STATION LIMITED**

Submitter #31037

AND **QUEENSTOWN LAKES DISTRICT COUNCIL**

Planning Authority

**EVIDENCE OF BRETT JAMES GIDDENS IN SUPPORT OF
THE SUBMISSION OF GIBBSTON VALLEY STATION LIMITED**

29 MAY 2020

Counsel instructed:

JGH BARRISTER

J D K Gardner-Hopkins

Phone: 04 889 2776

james@jghbarrister.com

PO Box 25-160

WELLINGTON

PROFESSIONAL DETAILS

Qualifications and experience

1. My full name is Brett James Giddens.
2. I am a Senior Planner and Managing Director of Town Planning Group (NZ) Limited, a resource management and development consultancy established in 2006 with offices in Queenstown, Christchurch and Auckland.
3. I am an associate member of the New Zealand Planning Institute and have over 17 years planning experience. I hold the qualifications of Bachelor of Science (Geology) from Canterbury University, Master of Environmental Management from Lincoln University, Master of Regional and Resource Planning (current) from Massey University.
4. Prior to establishing Town Planning Group, I had been employed in planning and development for local authorities, as well as in private practice undertaking planning work throughout New Zealand. This work has included large scale plan changes, development planning and consenting, policy development, and consent processing for local authorities. Clients include private landowners, corporations, iwi groups, local authorities and government agencies.
5. I have been working with the Queenstown Lakes District Plan since 2003 and I am very familiar with the current Operative and Proposed Plans, as well as its former versions. I have been involved in the review of the Queenstown Lakes District Plan for a large number of clients and have provided planning advice and evidence in both Stage 1 and 2, and more recently, Stage 3, of the review.

Code of conduct

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

Background Involvement

8. I prepared the submission made by Gibbston Valley Station Limited ("**GVS**") in respect of this hearing topic (#31037).
9. Prior to that, I provided the original planning advice to GVS in respect of its submission on the Queenstown Lakes Proposed District Plan ("**PDP**") seeking the rezoning of certain of its land to a Gibbston Valley Resort Zone ("**GVRZ**"). Consent orders were issued by the Environment Court on 27 November 2019. GVS has sought the rehearing of an aspect of the GVRZ provisions, but that is not material to the current proceedings.

SCOPE OF EVIDENCE

10. My evidence confirms that GVS generally seeks the outcomes sought in its submission #31037 and will focus on the matters of relevance to my expertise in planning.
11. I have read, and will respond to as necessary, the section 42A report and evidence on behalf of QLDC relating to the GVS submission:
 - (a) Mr Barr's strategic overview evidence for Stage 3;
 - (b) the s42A Report of Ms Grace;
 - (c) the evidence of Mr Jones (landscape);
 - (d) the evidence of Mr Bond (geotechnical); and
 - (e) the evidence of Mr Dicey (viticulture).
12. I have read and rely on the following evidence on behalf of GVS:
 - (a) Mr Greg Hunt (GVS);
 - (b) Mr Tony Milne (landscape);
 - (c) Mr Andy Carr (transportation); and
 - (d) Mr Chris Brown (infrastructure).

EXECUTIVE SUMMARY

13. GVS seeks to rezone an area of land within the station from part Gibbston Character Zone (**GCZ**) and Rural to Rural Visitor Zone (**RVZ**).
14. The proposal is guided by a structure plan that seeks to avoid development in areas identified as High and Moderate-High sensitivity. The proposed Primary Development Areas are all located in areas of lower landscape sensitivity and are considered to be appropriate locations for development to occur, exhibiting factors including but not limited to favourable topography, ease of access, reasonable sunlight access, quality views and presence of existing modifications.
15. The amended RVZ introduces a new objective and policies relating to the structure plan framework. New and amended rules implement the policies which overall give effect to the objectives. The conclusion reached by Ms Grace in regard to the consistency with the strategic objectives of the PDP still stands in my assessment.
16. In considering the rezoning assessment "principles" identified by Mr Barr at [8.7] of his stage 3 Strategic overview evidence, in my opinion:
 - (a) The zone boundaries are appropriately located.
 - (b) The zone change is consistent with the objectives and policies of the proposed RVZ, and is further supported by a specific objective and policy framework relating to the imposition of a structure plan for Gibbston Valley Station.

- (c) The zone change is consistent with the PDP Strategic Directions chapters (Chapters 3-6), as set out in the evidence of Ms Grace. The amended proposal outlined by GVS maintains consistency with these chapters.
 - (d) The rezoning gives effect to the Operative Regional Policy Statement.
 - (e) The changes are consistent with PDP maps that indicate additional overlays or constraints.
 - (f) The RVZ changes take into account the location and environmental features of the site, including infrastructure, hazards and roading.
 - (g) There is adequate separation and/or management between incompatible land uses.
 - (h) Rezoning is the most appropriate option compared to a resource consent path.
17. The proposal has been assessed under section 32 of the RMA and ultimately against Part 2. I have concluded that the proposed Rural Visitor Zoning is the most appropriate zone for the GVS site and represents the best option.

REZONING – ISSUES

18. I agree with Ms Grace's s42A report where she summarises the differences between the RVZ and the Rural Zone at [8.4] to [8.7], and in particular that:
- (a) The RVZ is more permissive in respect of visitor accommodation and commercial recreational activities;
 - (b) The RVZ is less enabling of farm buildings and residential activities, and provides a lower maximum height limit.
 - (c) The RVZ manages the effects of development on landscape, through the identification and mapping of levels of landscape sensitivity (low, moderate, moderate-high and high), with buildings having Controlled consent status within low or moderate landscape sensitivity, as opposed to a general Discretionary consent status in the Rural Zone.
19. I also agree that the differences between the RVZ and the GCZ are also similar (refer Ms Grace's paragraph [11.3]), as the GCZ is similar to the Rural Zone, but with refinements to reflect the viticulture and associated activities (e.g. wineries) in that area.
20. I agree that the "mapping" exercise is therefore a key consideration for the rezoning of any land to RVZ.
21. Ms Grace in her report confirms that:
- (a) there is no "Natural Hazard" impediment to the rezoning of GVS land as sought to RVZ, at [11.7];¹

¹ relying on the evidence of Mr Bond

- (b) there is no “Landscape” impediment to the rezoning of GVS land to RVZ, at [11.8], subject to a detailed landscape assessment and, potentially, a structure planning exercise.²
- (c) there is no “Viticulture” impediment to the rezoning of GVS land to RVZ, at [11.11], in particular there being no “loss of productive land for viticulture purposes”.³

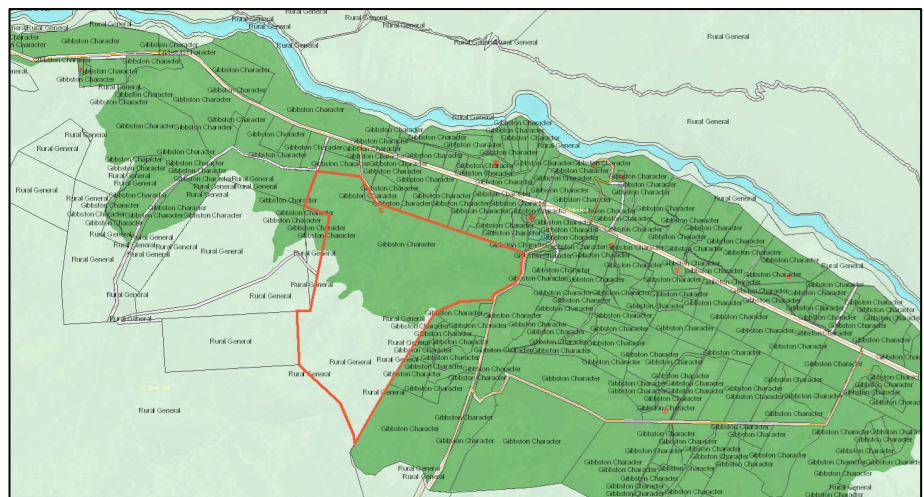
22. Accordingly, her recommendation against the rezoning of the GVS land to RVZ, at [11.14] appears to be primarily based on a lack of information on landscape sensitivity. Ms Grace states at [11.13]:

... I would expect any assessment of landscape matters, as set out by Mr Jones, to significantly reduce the area of the GVS site sought to be re-zoned, so that it is limited to being comprised of areas of predominately lower landscape sensitivity, and covers only an area suitable for controlled activity development. ...

23. GVS has taken this on board and has considered the extent of rezoning sought and expert landscape advice has been sought from Mr Tony Milne.

Proposed Rezoning

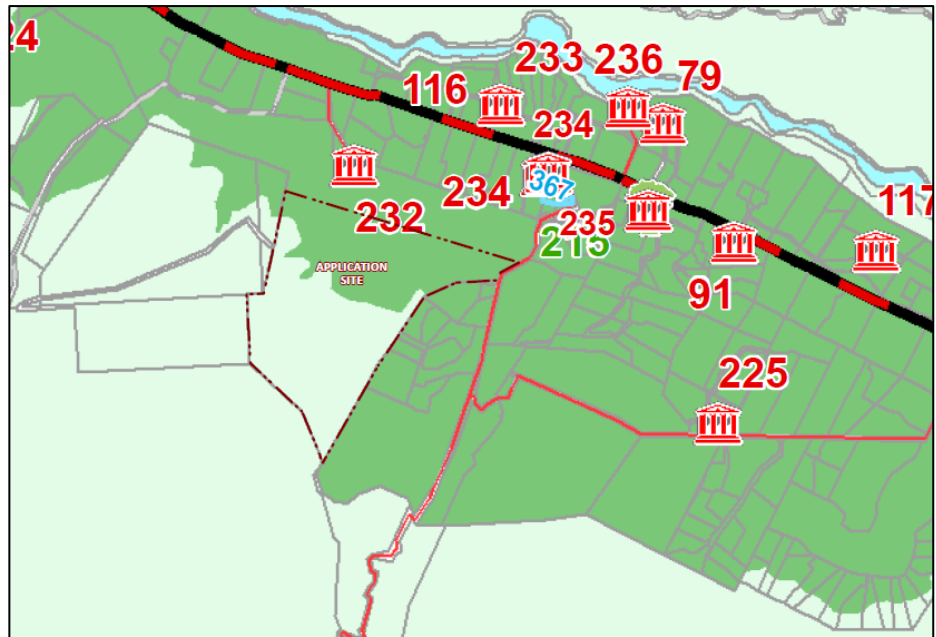
24. In its submission GVS sought the rezoning of the following land, as outlined in red below:



25. For jurisdictional purposes, I understand that GVS is not withdrawing that request (in case refinements need to be made within the scope of that original request). However, it has looked more closely at its zoning request and the extent of land that would appear to be “most appropriate” for rezoning to RVZ.

26. GVS is now proposing the following area to be rezoned as RVZ:

² relying on the evidence of Mr Jones.
³ relying on the evidence of Mr Dicey.



27. GVS is also proposing to adopt a structure plan approach to help guide future development and subdivision. This has been thoroughly considered in the evidence of Mr Milne.
28. I have also considered the rezoning assessment “principles” identified by Mr Barr at [8.7] of his Stage 3 Strategic overview evidence.
29. GVS is seeking amendments to the zone. The focus of my assessment is on those changes proposed.

AMENDMENTS TO PDP PROVISIONS

30. Ms Grace also proposes a number of changes to the RVZ provisions as set out in her section 42A report.
31. I have suggested a number of amendments to the planning provisions (as contained in **Appendix A** to my evidence) and I will discuss these further below.

Introduction of a Structure Plan

32. The RVZs are contained across the district and I consider that there is no impediment for each of the areas to have a specific structure plan. In my opinion, this is the most efficient method in guiding land use and development within the zone, particularly given the policy framework is directive towards the identification of three areas of landscape sensitivity (low, low to moderate, and high). Mr Milne at is [75] discusses the structure plan for the Gibbston Valley RVZ.
33. I understand that the approach taken by the Council thus far is to have the areas of high landscape sensitivity shown on the zone plan. In my opinion, this is not the best place for this descriptor. Other zones throughout the district, including the rural zones, undeniably include high landscape sensitivity areas but these areas are not shown on the zone maps. Introducing this feature onto a structure plan that sits within the zone

chapter is in my opinion the most appropriate place to contain this information.

Zone Purpose

34. The purpose of the zone (46.1) should contain an explanation relating to structure plans and what they seek to achieve in the context of the zone. I have suggested an addition in this regard.

Objectives and Policies

35. As a general comment, I consider that the objective and policy framework for the zone to be somewhat repetitive, and that there may be an opportunity to further refine the objectives and policies to achieve a clearer direction. While I have not made specific comments in my recommendation, I am happy to discuss this with the Commissioners as necessary at the hearing.
36. In regard to Policy 46.2.4 relating to exterior lighting, I believe that this should be further strengthened to minimize the effects of external lighting as I have suggested and supported by Mr Milne. Given the RVZs are in remote locations, the effects of lighting to guests internal to the zones would have a greater effect on the appreciate of the night sky.
37. In regard to Policy 46.2.1.7 relating to residential activity within the RVZ, I consider it appropriate for there to be an exemption for residential activity undertaken by an owner. Mr Hunt has provided evidence on this point and I will further discuss this in light of proposed Rule 46.5.9.
38. I suggest a specific objective relating to structure plans (Objective 46.2.3) with accompanying policies. I gave consideration to whether each area within the RVZ should have its own objective and policies, but concluded that the framework is better served by having a broader objective that can be applied to all areas that have structure plans with policy that is more directive to what development should occur. Given the broadness of the principle Objective 46.2.1, I did not consider that many policies are required under the new objective as the coverage of issues is sufficient.
39. Policies 46.2.3.1 and 46.2.3.2 relates to activities that can occur in appropriate locations guided by the structure plan.
40. As supported by Mr Milne, I consider that it is appropriate that infrastructure and roading in these zones is established to a more “rural” standard, with urban forms avoided. Practically, many sites may not be able to be serviced through conventional methods and more creative ways may need to be explored. In this context, I believe a policy is essential to enable this type of thinking, in both the RVZ and also in the subdivision chapter (see Policies 46.2.3.3 and 26.2.3.4).
41. I also suggest a new Objective 27.3.14 relating to subdivision and development in accordance with the Gibbston Valley RVZ, with two associated policies.

Rules

42. Rule 46.4.6 relates to buildings as a controlled activity, with a matter of control including “density”. I do not agree that this should be a matter of control – I consider that it would be ineffective to manage as part of this rule. Density is more appropriately considered as a matter of discretion under Rule 46.5.2 relating to building size. The issue of consideration in Rule 46.5.2 more directly relates to the issue of density.
43. I have also proposed amendments to the matters of control and have added a matter relating to “heritage values”. I do not consider that matter ‘x’ relating to electricity infrastructure should be added as a matter of control, rather the advice note under 46.3.3.X is sufficient and most appropriate.
44. As a general comment, I consider that the restriction on residential activity (Rule 46.4.13) in the RVZ is too onerous and would support this as a discretionary activity. From an effects perspective, I do not see how a residential activity in a remote location should give rise to adverse effects of such significance that they should be afforded non-complying activity status. With the inclusion of Rule 46.5.9, which I discuss below, I would agree that an appropriate balance has been achieved where non-complying status for residential activities could remain.
45. Rule 46.5.1 relates to building height. I know firsthand from my experience with a considerable number of resource consents for buildings that 6m is an awkward design height; it generally enables one level with a loft. In my opinion, the minimum height should be increased to either 7m or 8m at a minimum to ensure that building efficiencies can be provided for without having to seek a non-complying consent. Mr Milne supports 7m building height in certain locations shown on the structure plan.
46. I consider Rule 46.5.2 in its current form needs further thought. I agree that a control should be placed on the maximum ground floor area of a building with matters of discretion to guide the assessment of larger buildings and its effects. The “cap” of 500m² of built form “across the zoned area” is arbitrary and will result in inefficient consenting, effectively doing-away with the controlled activity Rule 46.4.6 by virtue of having such a small rule-breach trigger.
47. In my opinion, Rule 46.5.2 should be amended to:
- (a) Relate to a much larger threshold for total building coverage “across the zoned area”, informed by landscape expertise rather than use of an arbitrary figure;
 - (b) The term “across the zoned area” should be amended because it could be misinterpreted to relate to the entire Rural Visitor Zone in Chapter 46, rather than the location-specific RVZ that I expect this rule was intended to relate to;
 - (c) The matters of discretion should be clearer, for instance, “(a) landscape” changed to “(a) effects on landscape character”, and a new (d) added for “density of development”.
48. I support Rule 46.5.2 being excluded from triggering the need for affected persons approval or notification in 46.6. This, in my opinion, is essential to

enable development to occur efficiently within the RVZs recognizing their isolation and remoteness from neighbors.

49. Rule 46.5.5 relates to building setbacks from zone boundaries. In my opinion, this rule is not needed where any RVZ has a structure plan. This rule in most cases would serve no practical purposes in avoiding, remedying or mitigating adverse effects that are not already achieved through adherence to a structure plan.
50. If this rule is retained, then I consider that the exception under 46.6 should be removed to ensure that any such breaches are not publicly notified or require affected persons approvals.
51. In regard to Rule 46.5.8 relating the building materials and colours, I consider that heritage values should be added as a matter of discretion. Most of the RVZs have some historical associations and I consider that built form that considers the relevant heritage context would be a useful addition.
52. Rule 46.5.9 enables visitor accommodation units to have 180 days use by the owner, importantly retaining the principle activity as visitor accommodation which in this particular case, would uphold the policy framework in the chapter without needing further amendment. This rule was adopted in the Gibbston Valley Resort Zone and the benefits of the rule are discussed in the evidence of Mr Hunt.
53. Rule 46.5.10 has been proposed to implement Policy 46.2.3.3 relating to rural roading. Rule 46.5.11 has been proposed to implement Policy 46.2.3.4 relating to infrastructure in remote locations.
54. Finally, I consider that a new Rule 46.5.11 needs to be included to require that development be undertaken in general accordance with a structure plan. This rule is important to implement the policies which give effect to the objectives.
55. Where an area has a structure plan, it should be contained in 46.7 of the chapter for clarity.
56. Turning to the subdivision chapter, I consider a specific objective and policies should be included for each Rural Visitor Zone that has a structure plan. This would be a consistent approach to that already taken in Chapter 27 and would mean that the structure has a link to both the land use and subdivision component of development. New Objective 27.3.14 for the Gibbston Valley RVZ and its structure plan, supported by Policies 27.3.14.1 and 27.3.14.2.

Regional Policy Statement(s)

57. The RMA requires that the proposal give effect to the Operative Regional Policy Statement (**RPS**). In this regard the partially operative RPS (2019) is of relevance.⁴ In summary:

⁴ The Operative RPS (1998) does not contain relevant objectives and policies (that are still operative) and the proposed RPS (2015), while taken into account, does not require to be given effect to.

- (a) The proposal will maintain the regional natural resources, including the outstanding natural landscapes (Objective 3.1 and Policy 3.1.10); and
- (b) The ONL will be protected and enhanced (Objective 3.2 and Policy 3.2.3), with effects managed (Policy 3.2.4).

58. In my opinion, the proposal of GVS will give effect to the operative RPS.

SECTION 32 OF RMA

Evaluation

59. For the purposes of section 32, I have treated the request of GVS as an “amending proposal”⁵, meaning the examination as to whether the provisions are the most appropriate way to achieve the objectives must relate to:

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect.

60. As set out above, an additional objective is included in the amending proposal within the RVZ and a new objective within the subdivision chapter of the PDP.

61. Section 32AA requires a further evaluation for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed⁶, must be undertaken in accordance with section 32 (1) to (4)⁷, and must be undertaken at a level of detail that corresponds to the scale and significance of the changes.⁸ For completeness, I note that section 32 (4) is not relevant here.

62. The two new “objectives of the proposal” have been identified in my **Appendix A** and discussed in [37] and [40] above. The two other relevant objectives are set out below:

- 46.2.1 Objective⁹** – Visitor accommodation, commercial recreation, and ancillary commercial activities are provided for through a Rural Visitor Zone that:
 - a. protect the landscape values of Outstanding Natural Landscapes; and
 - b. maintain the landscape character, and maintain or enhance the visual amenity values of Rural Character Landscapes.
- 46.2.2 Objective¹⁰** – Buildings and development that have a visitor industry related use are enabled within the Rural Visitor Zone in areas of lower landscape sensitivity and where necessary are restricted or avoided to:
 - a. protect the landscape values of Outstanding Natural Landscapes, and

⁵ Section 32 (3) of RMA

⁶ Section 32AA (1) (a) of the RMA

⁷ Section 32AA (1) (b) of the RMA

⁸ Section 32AA (1) (c) of the RMA

⁹ As contained in the section 42A report

¹⁰ As contained in the section 42A report

b. maintain the landscape character and maintain or enhance the visual amenity values of Rural Character Landscapes.

63. Together the objectives effectively:
- (a) Manage activities within the zone with commensurate consideration of landscape values;
 - (b) Manage buildings and development within the zone with commensurate consideration of landscape values; and
 - (c) Require development in areas which have a structure plan to be undertaken in general accordance with such plan, including subdivision.
64. In my opinion the inclusion of a structure plan is the most effective method that can be included in the provisions to clearly demonstrate where the areas of low, medium and high sensitivity are located, which in turn, will increase efficiencies within the zones when it comes to consenting development through the guidance of a comprehensible 'plan' and accompanying policy and rule framework.
65. The provisions, discussed above, are the most appropriate way to achieve the objectives, and the objectives are the most appropriate way to implement the amending proposal.
66. Section 31 (1) (b) requires an examination of the provisions of the proposal. The provisions are the policies, rules and other methods that implement, or give effect to, the objectives.¹¹ My focus above is on the amended and new policies and rules I recommend as part of the "amending proposal". I have commented above already on the appropriateness of the Structure Plan as a method that gives effect to the objectives.
67. Section 32 (1) (b) (ii) requires an examination as to whether the provisions in the amending proposal¹² are the most appropriate way to achieve the objectives by assessing the efficiency and effectiveness of the provisions in achieving the objectives. The requirements of this sub-clause are further subject to section 32 (2).
68. The provisions are in my opinion the most appropriate way to achieve the objectives. By introducing a structure plan as a method, development and land use is appropriately guided to ensure that the rules implement the policies, and policies implement the objectives.¹³
69. In undertaking an examination of the provisions, it is appropriate to consider the environmental effects.¹⁴

Effects on the Environment

70. The key environmental effects relate to landscape values, which have been evaluated and addressed by Mr Milne. Other environmental effects include those relating to transportation, infrastructure and productive land uses.

¹¹ Section 32 (6) (a) of the RMA

¹² As required under section 32 (3)

¹³ Section 32 (1) (b) (iii)

¹⁴ Section 32 (1) (c) and Section 32 (2)

71. Landscape effects have been identified and will be managed through the structure plan and methods (rules) relating to development and subdivision.
72. Transportation effects have been assessed by Mr Carr and he has concluded that the rezoning of the site can be supported with no adverse effects anticipated related to road safety and efficiency, finding at [44] and [45] that the State Highway 6/ Coalpit Road and State Highway 6 / Resta Road intersections have ample spare capacity to serve a much greater amount of development than that provided through the proposed RVZ.
73. Mr Brown finds that development within the zone can be appropriately serviced with infrastructure. Additional provisions (rules and policies) have been introduced to take into account the remote location and that “standard” solutions may not be the best outcome in all circumstances in the RV zones.
74. The economic benefits¹⁵ of the proposal would be positive on a number of levels. I have had regard to the evidence of Mr hunt in this regard and taken into account the synergies of the zone to the activities throughout Gibbston as well as the eventual development of the Gibbston Valley Resort Zone. While not only providing for the growth of GVS and tourism operations, the proposal will introduce opportunities for visitor related activity providing a unique experience for guests that showcases the natural landscape values of the site and Gibbston Valley whilst also drawing on the attractions offered within the locality of Gibbston and the wider region. The benefits and indirect benefits of construction are well known in the district.

Cost / Benefits and Other Options

75. Taking into account section 32 (2), my opinion is that the benefits of the amending proposal far outweigh any negative effects, which could be largely attribute to landscape effects. In this regard I have relied on the evidence of Mr Milne.
76. In regard to section 32 (1) (b) (i), and taking into account section 32 (3) relating to an “amending proposal”, there are broadly two other options available to the submitter that could be considered “reasonably practicable options” for achieving the objectives:
- (a) Maintain the status quo (undeveloped pasture land); or
 - (b) Develop the land for viticulture in accordance with the GCZ or general farming purposes in accordance with the Rural Zone.
77. Maintaining the status quo (option 1) would avoid development in that part of the site that is located within an ONL (being that currently zoned Rural). This would not achieve the objectives and it would not enable development and use of that part of the site that is of lower landscape sensitivity, as identified by Mr Milne.
78. As set out in the evidence of Mr Dicey for the Council, the land is not ideally suited for viticulture. I also note in this regard that Gibbston Valley Station has a large landholding that is earmarked for future viticultural activities and that demand for additional vines in this location would not be realized in the long term given the significant investment that the submitter will be

¹⁵ Section 32 (2) (a) (i) and (ii) of the RMA

making in the short to medium term. Likewise, for the same reasons, farming is not considered the most efficient use. A fundamental issue that hinders any productive use of the property is the lack of water for irrigation. I consider that option 2 would not achieve the objectives.

79. If the proposed change in zoning from Gibbston Character and Rural to Rural Visitor Zone takes place, then compared with the land use regime currently proposed under the PDP:
- (a) There would be a mechanism in place to ensure that development in this area is undertaken in a managed and integrated manner, guided by a structure plan.
 - (b) There would be an increase in short-term accommodation for visitors and guests, and further promotion of visitor activities.
 - (c) The ONL would be retained and areas of high landscape sensitivity avoided.
 - (d) There would be little change in terms of the prospects for rural production given the permitted activity status of viticulture and horticulture in the Gibbston Character Zone.
80. In my opinion, the most appropriate option is that outlined in the amending proposal.

Certainty

81. The provisions for the RVZ are considered to be thorough and certain, and greatly assisted by the inclusion of a Structure Plan. The proposal is well informed and uncertainty is relatively low. The proposed provisions provide for a clear consenting pathway.
82. In my opinion, there is certain and sufficient information on the subject matter of the provisions, and the risk of not acting will result in an inferior outcome in the context of achieving the purpose of the RMA.¹⁶

Part 2 of the RMA

83. In landing back at section 31(1)(a), an examination is required of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the RMA.
84. The purpose of the RMA is to promote the sustainable management of natural and physical resources. Sustainable management means managing the use development and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety subject to the three qualifications in subsections (a), (b) and (c).
85. Section 6 (Matters of National Importance) is of direct relevance, and a number of matters need to be recognized and provided for, including:

- (b) *the protection of outstanding natural features and landscapes from inappropriate subdivision, use, and development:*

¹⁶ Section 32 (2) (c) of the RMA

86. The site is almost entirely located within an ONL (with the exception of that land located in the GCZ). Development as proposed is not considered “inappropriate” and the ONL has been appropriately protected.
87. Section 7 contains other matters that particular regard shall be had, including:
- (b) *the efficient use and development of natural and physical resources:*
 - (c) *the maintenance and enhancement of amenity values:*
 - (f) *maintenance and enhancement of the quality of the environment:*
88. The proposal represents the most efficient use of the land resource and through the controls proposed, including the structure plan, amenity values and the quality of the environment will be maintained and further enhanced at the time of development.
89. Section 8 relates to the Treaty of Waitangi, of which the proposal will not offend in any way.
90. In my opinion the proposal accords with the purpose of the RMA. Furthermore, the proposal better achieves the PDP’s objectives and thereby Part 2 of the RMA in a more efficient and effective manner than the framework as notified.

Brett Giddens
29 May 2020