

**BEFORE THE HEARINGS PANEL
APPOINTED BY THE QUEENSTOWN
LAKES DISTRICT COUNCIL**

Under the Resource Management Act 1991

In the matter of: the Te Putahi Ladies Mile Plan Variation to the
Proposed Queenstown Lakes District Plan

and the submissions by Winter Miles Airstream Ltd

Planning Evidence of Brett James Giddens

20 October 2023



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1. **INTRODUCTION**

- 1.1 My full name is Brett James Giddens.
- 1.2 I am the Managing Director of Town Planning Group (NZ) Limited, a resource management and planning consultancy established in 2006 that provides planning and resource development advice to private clients, local authorities and government agencies New Zealand-wide.
- 1.3 I hold a Bachelor of Science in Geology from the University of Canterbury, a Master of Applied Science in Environmental Management from Lincoln University, and have partially completed a Master of Resource & Environmental Planning from Massey University. I am an Associate of the New Zealand Planning Institute, a member of the New Zealand Resource Management Law Association, and a member of the Urban Design Forum of New Zealand.
- 1.4 I have over 20 years' experience as a practising planner in New Zealand, with a focus on statutory planning, environmental assessment, policy development and analysis, and consenting. I am regularly engaged as an expert planning witness before Council hearings and the Courts. I have been involved in numerous district and regional plan change processes throughout New Zealand.
- 1.5 I have a working knowledge of the Queenstown Lakes Proposed District Plan (**PDP**) and have worked extensively in the district through my planning career. I have been involved in the plan formulation processes relating to the former Operative District Plan as well as Stages 1, 2 and 3 of the PDP (and its variations).
- 1.6 I am very familiar with the Ladies Mile locale, having being involved in a number of consenting projects in this area over the last 20 years, including expansions of Lake Hayes Estate and a number of smaller scale subdivisions.

2. **CODE OF CONDUCT**

2.1 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023. I have complied with it in preparing my evidence. I confirm that the issues addressed in this statement of evidence are within my area of expertise, except where relying on the opinion or evidence of other witnesses. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

3. **SCOPE OF EVIDENCE**

3.1 I have been asked by Winter Miles Airstream Ltd (**WMAL**) to provide planning evidence with respect to the the Te Pūtahi Ladies Mile Plan Variation to the PDP relating to rezone areas of Rural, Rural Lifestyle, and Large Lot Residential land located in Te Pūtahi/Ladies Mile Corridor between Kimi-ākau/Shotover River and Te Whaka-ata a Haki-te-kura/Lake Hayes (**Variation**).

3.2 WMAL is the owner of a 3.3267 ha parcel of land (**Site**) (Lot 2 DP 359142) that is currently zoned Rural Lifestyle in the PDP and is located within the area that is subject to the Variation. The Site contains a residential dwelling, a number of ancillary buildings and a helipad. It is proposed to be located within the High Density Residential precinct under the Variation.

3.3 For the most part, and at a high level, WMAL supports the Variation as representing a sound measure to enable higher density of urban development on Ladies Mile. However, WMAL is concerned that aspects of the Variation are overly restrictive / prescriptive and do not represent sound resource management principles and practice. I address these matters in Section 6 of my evidence.

3.4 I have read the traffic evidence of Mr Leo Hills on behalf of WMAL and rely on his findings. Mr Hills had a specific focus on the transport infrastructure triggers in Rule 49.5.33 of the Variation, specifically:

- (a) The extent of their application to the Variation area;

- (b) Issues with the interpretation of these provisions and the reasons why the transport infrastructure triggers for the Variation should only apply to the relevant sub-areas within the Variation area; and
 - (c) The appropriateness of the transport infrastructure triggers for Variation Sub-Area E (in which the Submitter's property is located).
- 3.5 I also address the transport infrastructure issues in Section 6 of my evidence.
- 3.6 I have also read the evidence provided by the Council in support of the Variation.
- 3.7 The issues of concern to WMAL are thoroughly outlined in the WMAL submission; contained in **Annexure A**. The issues are what I would describe as confined and relate generally to the mechanics of the provisions to better enable the outcomes in the Variation to be realised. I have therefore not provided an overview of the statutory planning framework and rather have relied in general on the assessment undertaken by Mr Brown as set out in the section 42A report.

4. **EXECUTIVE SUMMARY**

- 4.1 The Variation seeks to establish a planning framework to enable an urban environment on Ladies Mile that accommodates around 2,400 households. WMAL's site is integral to enabling that to be achieved, being a relatively large development block on the northern side of State Highway 6 (**SH6**) that is shown on the Master Plan as integrating with a number of other sites in what I would describe as the 'high yielding focussed' area of Ladies Mile.
- 4.2 My primary concern is the adequacy of the provisions of the Variation to enable this outcome to be achieved in an efficient and certain manner, which leads me to a primary question: **What benefit is an enabling urban zone if it cannot efficiently and effectively provide for the outcomes it seeks to enable?**

- 4.3 In my opinion, further consideration needs to be given to the 'triggers' that prevent the zoning from being given effect to (namely the transportation and infrastructure triggers) and how more certainty can be provided around timings for implementation of the various trigger requirements, such as roundabouts, crossings, bus lanes.
- 4.4 As set out in the evidence of Mr Hills, logic should have it that not all triggers are required to be put in place to enable development within the zone to proceed. If development of an area of Ladies Mile, such as the WMAL's Site, can be undertaken without causing inappropriate adverse effects, then it should follow that the triggers should reflect that.
- 4.5 The framework as currently proposed has significant tension with Policy 2 of the National Policy Statement for Urban Development (**NPS-UD**) which requires that Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term. While medium and long term demands may be met, the Variation does little to provide certainty that short term demands will be met.
- 4.6 I consider that a number of amendments to the provisions are necessary to best give effect to the objectives of the Variation and the higher order planning documents that sit under the RMA. Making these changes would, in my opinion, enable the outcomes directed in the objectives and policies for the Zone.
- 4.7 While the objectives of the Variation are broadly appropriate, I consider that further refinements are necessary to ensue they are the most appropriate way to achieve the purpose of the RMA. The policies by and large also require further refinements to ensure that they are the most appropriate way to achieve the objectives, addressing the deficiencies in their efficiency and effectiveness. I have concerns that the benefits will not on balance outweigh the costs of the Variation, and that further amendment to address efficiency and effectiveness (and reducing uncertainty) would overcome this issue.

4.8 I have marked up a copy of the provisions to reflect my suggested changes; contained in **Annexure B**.

5. **FRAMEWORK OVERVIEW**

5.1 The Zone Purpose (as amended by Mr Brown) is set out at 49.1 of the Variation (page 185 of the section 42A report). The Zone is underpinned by seven Objectives with corresponding policies.

5.2 Within the zone are a number of "precincts". WMAL's Site is situated within the proposed High Density Residential precinct.

5.3 As I have mentioned above, I have relied on the statutory overview provided by Mr Brown in his section 42A report and providing a reasonable overview of the framework.

6. **AMENDED PROVISIONS**

6.1 The following section of my evidence sets out and explains the amendments I consider are necessary and are most appropriate.

Structure Plan

6.2 WMAL sought some flexibility around adherence to the Structure Plan, whereby it currently requires development to be "in accordance" with it (or otherwise triggering a non-complying activity consent) to requiring development to be "in general accordance" with it.

6.3 I support this flexibility as being a key mechanism to enable development to occur at Ladies Mile using the Structure Plan as a relatively firm guide. Having some degree of flexibility will allow modifications to placement of buildings, roads, open spaces, etc, but still require the general principles to be achieved.

6.4 This is important in relation to WMAL's Site as it currently has a legal road through its land and its neighbours' land. The position of the connector road is shown on the Master Plan in a different location. This creates a significant issue in terms of practicality and the provisions currently do not provide for this.

- 6.5 I would not expect this change to enable material changes, but changes of a more minor degree.
- 6.6 I note the approach adopted in the Gibbston Valley Resort Zone whereby there is a rule requiring that development is 'in accordance with the Structure Plan' but the policies enable development to be 'in general accordance with it'. This approach provides for flexibility in the consenting process to make changes and a similar approach could be adopted here for efficiencies.

Information Requirements

- 6.7 In my opinion, the information required to be supplied with resource consent applications is excessive and unhelpful, with the result that it fails to provide a clear and efficient planning framework. I also consider there should be more thought given to providing a more permissive consenting framework alongside built form and design standards.
- 6.8 Mr Brown highlights the issue at his [11.174] in his discussion regarding housing typologies:

Removing any restriction or direction on density in this location and allowing the market to dictate the typologies of housing provided risks the inefficient use of the finite land resource for housing because the market could and perhaps would respond with primarily standalone typologies (and the larger land areas that these require) as these are, typically, the simplest to consent and sell. This would not provide a diversity in housing typology from the existing supply in the Eastern Corridor (which is primarily standalone housing) and would not contribute to enhancing housing affordability.

- 6.9 In my view, the Variation should make it "easier to consent" all housing typologies. There is no reason why a standalone dwelling should be any more difficult to consent than a larger multi-unit block, and, if that is an issue, it needs to be addressed in the provisions.
- 6.10 For example, Rule 49.4.4 relating to residential units in the medium and high-density precincts sets out matters of discretion that are so extensive that the activity status becomes effectively fully discretionary. In my experience, this will likely lead to slow and costly consenting processes that will inhibit the speed of implementation of the zone, increase the costs of development, and

therefore, result in a cost burden that will likely be passed onto purchasers, thus reducing affordability.

- 6.11 It is also unduly restrictive imposing a consent requirement for 'two or more residential units' whereby, given the intent of the zone, there should be a permitted activity regime enabling the development of a higher number of units on any given site. Given the breadth of design input set out in the standards of the zone, I consider this number should be at least 5 residential units.
- 6.12 As another example, the requirement in Rule 49.5.19 imposes a landscaping requirement on a "per site" basis where a site is located above ground level with the upshot that the outcome cannot be achieved and a development defaults to non-complying activity status.
- 6.13 The costs of an inefficient consenting process directly relate to delays in implementation of the housing product and a decrease in housing affordability, with costs being passed onto purchasers. This in turn will reduce economic growth (and the speed it is delivered). It will however produce further employment by supporting the network of resource management consultants required to navigate the complex planning environment.

Housing Affordability

- 6.14 'Housing affordability' is referred to throughout the provisions of the Variation, often without direction as to how that is to be achieved. WMAL is concerned that some of the plan provisions of the Variation may, to the contrary, increase unaffordability. This issue is discussed by Mr Brown from his paragraph [11.167].
- 6.15 I share the concerns of the submitters that there is no mechanism in the Variation to enable affordable housing. The other issue is that, with the significant controls, onerous consenting pathways and uncertainty around costs of 'triggers' and their timing, housing affordability will not be fostered through this Variation in the manner assumed by the Council and its experts.

- 6.16 The only mechanism I can see in the Variation that would contribute towards housing affordability is the increase in density enabled through the provisions, which may (or may not) provide some efficiencies of scale to development which, if the density is right, could reduce overall costs.
- 6.17 In my opinion, greater density is required in the Variation to further support the efficiencies in achieving high yields and contributing towards enabling build efficiencies.
- 6.18 This would best give effect to:
- (a) Proposed Objective 49.2.2 (Development achieves a range of residential intensity and diversity of housing choice to promote affordable homes, a self-sustaining community, and efficient use of urban land); and
 - (b) Objective 2 of the NPS-UD (Planning decisions improve housing affordability by supporting competitive land and development markets).

Residential Visitor Accommodation

- 6.19 WMAL's position is that "residential visitor accommodation" (**RVA**) (as defined in the PDP) does not represent, in and of itself, an activity that generates such adverse effects that it should be afforded non-complying activity status.
- 6.20 Mr Brown for the Council has opposed the relief sought. He notes at his [11.173]:
- ...the strong discouragement of Residential Visitor Accommodation and Visitor Accommodation in the residential precincts, through the non-complying status will ensure that the TPLM land and housing stock is retained for the primary purpose of housing fulltime residents of the District, rather than supporting the visitor accommodation industry.*
- 6.21 While I appreciate and agree with his comment in regard to Visitor Accommodation (as defined), I do not share his view with regard to RVA (as defined).

- 6.22 RVA¹ enables landowners an alternative income stream and provides an alternative form of accommodation to Visitor Accommodation. This is recognised by Ms Fairgray who supports enabling some level of visitor accommodation as this may improve the household economic position and increase the viability of high-density development.²
- 6.23 In effect, RVA is little different than a 'homestay', which notably is permitted in the proposed Zone. Both could be said to remove space from a residential unit to provide for visitors. In effect, there is very little difference.
- 6.24 I consider the RVA provisions similar to the Lower Density Suburban Residential Zone should be included within the Variation.

Residential Flats

- 6.25 The submission outlines a concern that residential flats are not unreasonably precluded by the provisions of the Variation and are recognised as an ancillary residential use that would support the shortage of accommodation in the Whakātipu area.
- 6.26 I understand that Mr Brown has agreed with this change and has updated the provisions to specify that residential flats are a permitted activity.
- 6.27 I consider that this is an important change in facilitating more accommodation on Ladies Mile and contributing towards housing affordability by providing an owner with another income stream (such as housing rental).

Commercial Activity

- 6.28 WMAL supported the establishment of a primary commercial precinct while refining the location of smaller scale commercial zoning across the Structure Plan to ensure that sufficient provision is made in response to the demand to be established from urban rezoning,

¹ Means the use of a building established as a residential unit (including a residential flat) by paying guests, where the length of stay by any guest is less than 90 nights. Excludes: Visitor Accommodation and Homestays.

² [11.240] of section 42A report.

including the allowance of 5,000m² of commercial precinct on WMAL's land.

- 6.29 A purpose of the zone is for it to be well-functioning, with Objective 49.2.6 seeking to minimise the need for additional vehicle trips. Accessibility is a key feature of the Variation.
- 6.30 To be accessible, a range of services need to be conveniently provided. I consider that the relief sought by WMAL achieves this.
- 6.31 In my opinion, the amended relief to seek an area of around 2,500m² will have no measurable effects on the commercial precinct at Ladies Mile and will be indiscernible in scale (and therefore negligible in effect) to the commercial centres of Frankton and Queenstown.
- 6.32 Mr Brown³ and Ms Hamson both support increasing the GFA cap on a supermarket tenant within the Commercial Precinct from 2,000m² to 4,000m². Neither have considered the flow on effect from this in that there would be a loss of 2,000m² of commercial land that would otherwise be taken up by other commercial activity.
- 6.33 In my opinion, the relatively small local commercial area proposed by WMAL can be easily absorbed in this location, providing localised amenities such as a café or day care facility for example.

Trigger Points and Staging

- 6.34 There is uncertainty around how the trigger points are intended to function in the Variation. This issue was not directly responded to in the section 42A report, but some clarification has been provided in the Council traffic evidence that indicates the triggers are to be applied respectively to the areas set out in the rules.
- 6.35 Of particular concern is Rule 49.5.33, which provides that private development within the Variation Sub-Areas (i.e., excluding utilities and other physical infrastructure) shown on the Structure Plan

³ Paragraph 11.159 of section 42A report.

cannot occur prior to all the corresponding transport infrastructural works listed in the rule being completed. Rule 49.5.33 states that:

*Development (except for utilities and other physical infrastructure) within the Te Pūtahi Ladies Mile Sub-Areas shown on the Structure Plan shall not occur prior to **all** the corresponding transport infrastructural works listed below being completed.*

6.36 I consider this to be a critical issue, as the implication of having all the triggers required to be completed prior to any development occurring in the zone effectively means that the zoning process achieves little more than assisting longer term demands.

6.37 Mr Brown discusses the staging/triggers at his [11.205]:

The purpose of the infrastructure staging provisions is to ensure that the transport infrastructure upgrades are in place prior to the rollout of residential and commercial development. This will ensure that the infrastructure upgrading is in step with the development it serves, and that the adverse effects of development (the exacerbation of the existing peak hour traffic congestion on SH6) are avoided without the remedying or mitigation that the staging works will provide.

6.38 I agree with Mr Brown's stance that staging is (and should be) reflective of the development it serves. The wording of the relevant rules however is not clear that this is the intent and, in this regard, I have suggested further changes to assist with this.

6.39 My other concern is that there has been little consideration given to what development can occur in the Zone without the triggers needing to apply. This has been a concern raised by a number of submitters.

6.40 The efficiency of preventing development from occurring in the manner set out in the provisions needs to be balanced against the reality that the effects of *some* development can be absorbed without the need for those measures to be adopted.

6.41 I disagree with Mr Brown at his [11.208] where he states that:

"the infrastructure staging provisions are consistent with the direction in the NPS-UD, the regional instruments and the higher order PDP objective and policies for development and infrastructure to be integrated".

6.42 While integration is a feature in the higher order policy, this, in my opinion is subservient in importance to Objectives 1 and 2 of the NPS-UD, and Policy 2 (Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term).

6.43 Mr Brown acknowledges at his [11.213] that:

"The provisions have undoubted costs, from delaying development until the necessary works are in place, but these costs are outweighed, in my view, by the benefits..."

6.44 I agree with him regarding the costs, but I am not convinced that the benefits outweigh the costs. The cost that development is prevented is high, but this could be addressed by more certainty being provided around timing of implementation and funding by third parties.

6.45 As the 'triggers' relate to transportation, I rely on the expert evidence of Mr Hills. In this regard:

- (a) Mr Hills supports the Variation and the associated provisions to stage development to integrate with transport infrastructure; but
- (b) he considers the wording of Rule 49.5.33 should be clarified so that the works listed are required to be completed for the development of the corresponding sub-area only and that sub-areas can be developed without the completion of other transport works listed under other sub-areas; and
- (c) Mr Hills generally considers the triggers in Sub Area E are appropriate, however, Objective 49.2.6.4b relating to the preference for a pedestrian underpass should be removed (see below).

SH6 Crossing

6.46 Mr Hills considers the pedestrian/cycle crossing of SH6 east of Howards Drive in his evidence in chief. He generally agrees that some form of pedestrian crossing is required in this location to link

Sub-Area E to the existing area to the south and to future Sub-Area J.

6.47 I agree with Mr Hills that an at grade crossing in this location is most appropriate. I further note that this recommendation is also supported in the urban design evidence of Mr Stuart Dun at his [59], citing a more direct connection is preferred where CPTED concerns are avoided.

6.48 I consider that clause (b) under Policy 49.2.6.4 should be deleted.

Encourage the use of pedestrian and cycling modes by:
...
b. Preferring the provision of an underpass for the Key Crossing indicated on the Structure Plan;

Infrastructure

6.49 The Variation also includes a number of infrastructure triggers that prevent implementation of the zoning until such measures are put in place. This has been opposed by a number of submitters and summarised at [11.202] of the section 42A report.

6.50 At face value, this notion is not dissimilar to how an urban subdivision proposal is advanced, whereby it cannot be implemented until services are in place. The difference here, in my opinion, is that there are currently significant infrastructural barriers in the provisions that prevent the zoning itself from being implemented.

6.51 In my opinion, the provisions should provide for a landowner to establish their own infrastructure to service their development needs. Preventing this could have flow on effects for the overall efficiency of the zone.

6.52 From an effects perspective, if a landowner can show that they can sufficiently service a development, that should not present a barrier.

6.53 Mr Brown summarises the position on stormwater in his [11.216]:

The approach to stormwater management evolved during the masterplanning process, as has been described in detail in the evidence of John Gardiner. In summary, and as set out in the Masterplan Report, based on a series of Guiding Principles for stormwater management the original draft

masterplan (October 2021) proposed two centralised detention areas and swales to deal with water quality and quantity including capturing natural flows from Slope Hill. However, neither the Council nor the landowners were considered to be in a position to lead the implementation of the proposed centralised system, and the approach therefore shifted to a focus on developers promoting individual or less centralised stormwater management solutions to be assessed at resource consent stage, while still following the same guiding principles. The approach included the following key policy in the notified provisions:

...

6.54 WMAL supports the ability for stormwater to be dealt with by respective landowners on an individual basis (i.e. development block) or as a communal system. Fundamentally, in my opinion, flexibility here is key.

6.55 I support Policy 27.3.24.7 in this regard with the following amendment to provide context on the extent of effect to be avoided:

Require the design of stormwater management systems to avoid stormwater discharges to Lake Hayes and avoid the significant adverse effects of discharges to the Shotover and Kawarau Rivers, the State Highway network, and groundwater resources.

6.56 I disagree with Mr Brown's amendments to the Zone purpose outlined at his [11.227] where it directs matters that "must" be undertaken. At a zone purpose level, I consider that the broader application of such principles should be adopted where there is flexibility needed in design solutions.

6.57 I also disagree with his amendment to Assessment Matter 49.7 at his [11.227(f)] where he recommends a requirement to "give effect to the Guiding Principles for Stormwater Management set out in Chapter 27 Assessment Matters at 27.9.8." I do not consider that this directive is appropriate within an assessment matter and also that the guiding principles should remain outside of the provisions.

6.58 I welcome the opportunity presented by Mr Brown at his [11.227] to provide further input on the drafting of these provisions at conferencing.

6.59 Mr Brown considers the issue of uncertainty on development timing at his [11.152]:

Submitters consider that there is no obligation for landowners to adhere to a specific timeline for construction, potentially resulting in long periods of vacant land. I disagree, because there is significant commitment (from the HIF funding, the Way2Go partners' collaboration, and from what I understand (anecdotally) to be at least some of the developers' intentions to advance their development plans as quickly as possible if the zoning is confirmed.

- 6.60 Unfortunately, this response does nothing to assist with reducing uncertainty. Uncertainty needs to be addressed within the plan provisions.

Notification Issues

- 6.61 In my opinion, the Variation should contain clear direction and certainty in the provisions by requiring development in the High Density Residential precinct to be advanced without affected persons approval and without notification. This would increase efficiency and effectiveness of the provisions.

- 6.62 From an effects perspective, I consider that there are sufficient assessment criteria already contained within the framework to ensure a full evaluation of effects to support this approach.

7. SECTION 32AA

- 7.1 Section 32AA of the RMA sets out the requirements for further evaluations. Notably at sub-section (1), a further evaluation:

- (a) *is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the **changes**); and*
- (b) *must be undertaken in accordance with section 32(1) to (4); and*
- (c) *must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and*
- (d) *must—*
 - (i) *be published in an evaluation report that is made available for public inspection at the same time as the approved proposal (in the case of a national policy statement or a New Zealand coastal policy statement or a national planning standard), or the decision on the proposal, is notified; or*
 - (ii) *be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.*

- 7.2 Taking into account section 32AA(1), I have undertaken a brief further evaluation in consideration of the relatively confined changes sought. I note here for completeness, that the relief sought does not make any fundamental changes to the zone and structure of the Variation and therefore the assessment undertaken by the Council has been relied on.
- 7.3 The objectives of the proposal being evaluated are generally the most appropriate way to achieve the purpose of this Act.⁴ I appreciate that there is expert conferencing scheduled which will allow the experts to evaluate further the range of evidence produced and refine provisions accordingly.
- 7.4 In terms of my examination of the provisions and evaluation as to whether they are the most appropriate way to achieve the objectives, I note here that I am recommending changes to the provisions so further evaluation is necessary.
- 7.5 As I have set out above, I consider that there are currently issues with the mechanics of the provisions (primarily within the rule framework and to a lesser extent the policy framework) which contribute to the Variation being inefficient and less effective than it could be.
- 7.6 In terms of section 32(2), the costs and benefits of the amended proposal are confined. Notably:
- (a) There are no costs in terms of lost opportunities for urban intensification.
 - (b) The changes proposed relate to refining the mechanics of the provisions and overall assist with making them more efficient and effective.
 - (c) The benefits in the changes assist with integrating the zoning with its surrounding zones and environment, an outcome

⁴ Section 32 (1) (a).

which is specifically sought in the Zone purpose and through the objectives and policies of the Zone.

- (d) There will be no adverse cultural or economic effects arising from the amended proposal, and therefore no additional costs.
- (e) It is not expected that there will be any loss in terms of economic growth or employment opportunities arising from the amended proposal.

7.7 The proposed provisions (rules) are clear and will be straightforward to administer. They are efficient and effective in providing the means to implement the policies and ultimately achieve the objectives.

7.8 In my opinion, the amendments I have recommended represent the most appropriate means of achieving the objectives of the Variation.

7.9 Implementing the suggested changes will not undermine or alter the Variation and its main objective to provide an urban development outcome for this location. It will, however, enable the provisions to align well with the promoted objectives, achieve the National Policy Statement, and ultimately connect through its purpose.

8. **MINISTER'S STATEMENT OF EXPECTATIONS**

8.1 As per the Panel's minute 1, I have considered the Minister's Statement of Expectations for the proposed Te Pūtahi Ladies Mile Plan Variation in light of my suggested amendments outlined above.

8.2 In my opinion, the 'Amended Proposal', including my recommended amendments, will:

- (a) contribute to providing sufficient opportunities for the development of housing and business land to ensure a well-functioning urban environment including maximising opportunities to enable housing;
- (b) ensure that future development will be undertaken in a manner which recognises the limitations of the existing transport network in this location;

- (c) ensure appropriate and feasible infrastructure is provided for in Zone, including stormwater management that allows for future climate change impacts, and access to everyday needs through transport options that support emissions reduction (such as public and/or active transport); and
- (d) ensure future development will be undertaken in a manner that recognises and protects sensitive receiving environments.

Dated: 20 October 2023



Brett James Giddens