

Summary of Planning Evidence of Brett Giddens
Stage 3 of the PDP Review on behalf of Gibbston Valley Station

1. My name is Brett Giddens. I have provided planning evidence in support of the submission of Gibbston Valley Station (**GVS**), as set out in my evidence in chief dated 29 May 2020. My qualifications and experience are detailed in that evidence.
2. The differences in opinion between Ms Grace and I are very limited, with us both reaching the conclusion that the GVS land is appropriate to be zoned Rural Visitor (**RVZ**).
3. The GVS land is almost entirely located within an Outstanding Natural Landscape (**ONL**) and the proposal in my opinion strongly aligns with the intent of the *notified* RVZ chapter which – then – focussed solely on appropriate development in “remote” locations within ONLs. I understand that further refinements have been made to the provisions to provide for RVZs on land that is not located within an ONL; this has no bearing on the relief sought by GVS.
4. I have recommended some additional provisions and refinements to proposed Chapter 46 and Chapter 27; those provisions have been usefully summarised in Mr Gardiner-Hopkins legal submissions.
5. In summary, the changes I support for GVS include:
 - a. providing a structure plan to guide the location of future development (along with additional matters included in the chapter relating to structure plans).
 - b. refining policy 46.2.2.6 (d) to include reference to “air-based transport”.
 - c. introducing new policy 46.2.2.7 and new Rule 46.5.9 relating to rural roading and infrastructure (I understand that this is supported by Mr Jones but had not been adopted by Ms Grace).
 - d. refining the matters of control in Rule 46.4.6 (a) and (f) relating to landscape and traffic considerations.
 - e. introducing new Rule 46.4.4A providing for up to 180 days of residential activity in a visitor accommodation unit as a permitted activity.
 - f. introducing new Rule 46.5.1.3 providing for the permitted building height of 7m within the development area shown on the structure plan (as supported by Mr Jones and Ms Grace).
 - g. refining the matters of discretion in Rule 46.5.2 (Building Size) relating to landscape character and traffic effects.
 - h. removing the exception under 46.6 (Non-Notification) allowing public notification for buildings within zone setbacks and commercial recreation activities.
 - i. introducing an objective and policies in Chapter 27 (Subdivision and Development) relating to subdivision and development.
6. I would like to make an amendment to my suggested provisions to remove Policy 27.2.14.2 which seeks to avoid subdivision and development in high landscape

sensitivity areas. On reflection, the intent of this policy is already captured in Ms Grace's policies in Chapter 46.¹ My suggested policy could have unintended consequences of preventing subdivision for farming or conservation purposes, for example.

7. In regard to the refinement to policy 46.2.2.6 (d) relating to "air-based transport", I consider that this is a fundamental correction as currently Rule 46.5.7 relating to informal airports (providing up to 15 flights per week as a permitted activity) has no policy foundation. My amendment will resolve this issue.
8. In reference to Ms Grace's questioning by the Commissioners regarding structure plans, I understand that while she now supports the inclusion of structure plans, she considers that the landscape sensitivity areas within the RVZs (i.e. low, medium and high landscape sensitivity areas) should still be demarcated on the planning maps. I do not support this.
9. On the planning maps, this finer grain demarcation is visually confusing considering: (1) the generally small size of the RVZs in the district; and (2) that all the "high landscape sensitivity" areas with RVZs are in most cases only a very small part of a much wider outstanding natural landscape. To compartmentalise only a small part of the ONL gives the perception that an ONL within a RVZ is of greater landscape importance compared to ONLs outside of the RVZ.
10. In my opinion, the most appropriate place for this zone specific demarcation is within a structure plan, such as that proposed for GVS, which identifies the areas where development can be absorbed into the ONL (and also where it should be avoided) at a zone scale, not a district scale.
11. Overall, I confirm the conclusions reached in my evidence and support the rezoning of the GVS land.
12. I am happy to answer any questions that the commission may have.

Brett Giddens
30 July 2020

¹ For example, policy 46.2.2.1 (c)