

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of Proposed Plan Change 2 (Pukehangi Heights) to the Rotorua District Plan

STATEMENT OF EVIDENCE OF MATTHEW CRAIG ALLOTT

PLANNER

ON BEHALF OF TE ARAWA GROUP HOLDINGS LIMITED

18 September 2020

1.0 QUALIFICATIONS AND EXPERTISE

- 1.1 My name is Matthew Craig Allott and I am a Principal and Planner at Boffa Miskell Limited, a national firm of consulting planners, ecologists and landscape architects.
- 1.2 I hold the qualifications of Bachelor of Resource and Environmental Planning (Hons) from Massey University. I am a Full Member of the New Zealand Planning Institute.
- 1.3 I have been a planner in local government or as a planning consultant based in Tauranga, Rotorua, Auckland and Queenstown, and have 20 years' experience.
- 1.4 I have been involved in a range of resource consent and policy development matters from both a regulatory and consultancy viewpoint.
- 1.5 In this matter I have assisted Te Arawa Group Holdings Limited (TAGH) (Submitter # 20) with the preparation of primary submissions and further submissions in relation to Proposed Plan Change 2 (Pukehangi Heights) (**PPC2**) to the Rotorua District Plan (**District Plan**); and following a review of the Council Officer's Section 42A Report and supporting technical reports; TAGH has also requested that I prepare a statement of planning evidence, which canvasses their position in relation to PPC2.

2.0 CODE OF CONDUCT

- 2.1 I have read the Code of Conduct for Expert Witnesses issued as part of the Environment Court Practice Notes. I agree to comply with the code and am satisfied the matters I address in my evidence are within my expertise. I am not aware of any material facts that I have omitted that might alter or detract from the opinions I express in my evidence.

3.0 EXECUTIVE SUMMARY

- 3.1 TAGH agrees subject to appropriate 'checks and balances', that the Pukehangi Heights Development Area as identified in the Rotorua Spatial Plan 2018 can accommodate residential development in the short term.
- 3.2 Overall, TAGH concurs that there is a need to provide an improved supply of land for housing; and that the Pukehangi Heights Development Area has the potential to accommodate a significant part of the projected future demand for housing in Rotorua.
- 3.3 TAGH concurs with the purpose behind PPC2; that being to enable residential development to occur within the Pukehangi Heights Development Area in a comprehensively planned and integrated manner.
- 3.4 TAGH agrees with the proposed objectives, policies and place-specific principles, which seek to address landscape, urban design, cultural landscape and natural hazard risk management issues specific to the Pukehangi Heights Development Area; and that supplement the general objectives and policies for the Residential 1 and Rural 2 (Rural Lifestyle) zones.
- 3.5 TAGH agrees with the establishment of a structure plan to guide future development of land in relation to:
- landscape management;
 - urban design;
 - protection and enhancement of cultural values;
 - access and connectivity (including active transport modes);
and
 - stormwater infrastructure
- 3.6 The only component of PPC2 to which TAGH seeks an amendment is in relation to the issue of construction access. TAGH seeks an amendment to subdivision performance standards A5.2.3.4.12 and

A5.2.4.4.8, which would enable Matipo Avenue to be considered as an option for construction access. Any construction access option would be subject to a range of ‘checks and balances’ through the provision and subsequent approval of a construction traffic management plan to ensure traffic safety and convenience and the maintenance of amenity values at the time of construction.

4.0 SCOPE OF EVIDENCE

4.1 In summary; the scope of my evidence addresses the following matters:

- Background
- Key Issues
- TAGH’s Submission Points and the Council Officer’s Recommendations

5.0 BACKGROUND

5.1 TAGH manages the commercial assets of 11 Te Arawa iwi/hapū that collectively represent approximately 21,000 beneficiaries. TAGH has investments across agribusiness, forestry, tourism, property, geothermal and financial assets.

5.2 TAGH owns Lot 1 DP 355447, which comprises a land area of approximately 19.5 hectares. This land area is shown as ‘Area A’ within the Proposed Structure Plan (refer Figure 1 below).

5.3 As an owner of a portion of the land subject to these proceedings; TAGH has a vested interest in PPC2 and the planning/land use outcomes that will eventuate.

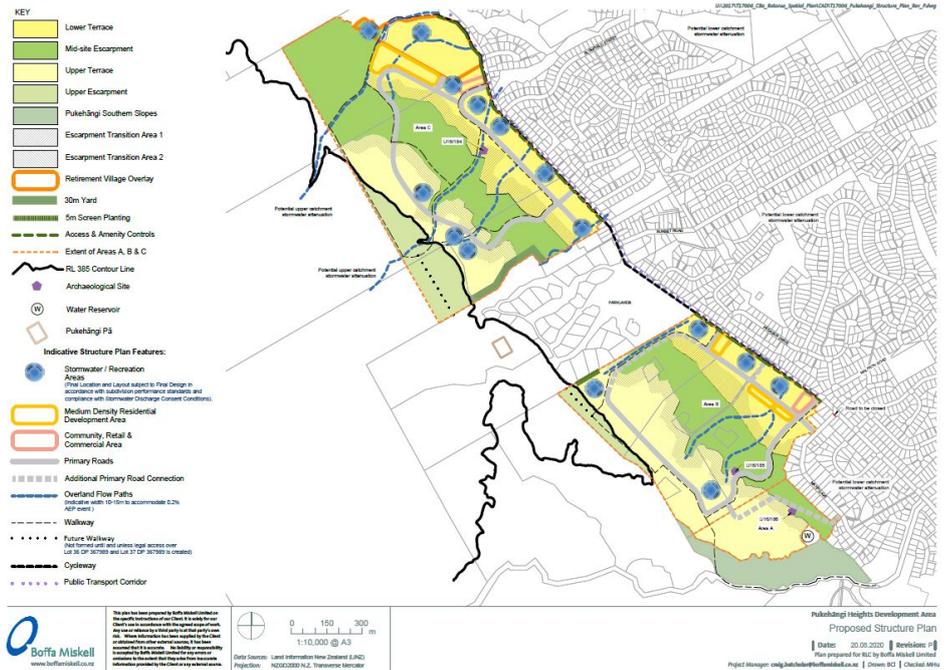


Figure 1: Proposed Structure Plan

6.0 KEY ISSUES

- 6.1 As stated in the Section 42A Planning Report, population in Rotorua has increased in recent years. Statistics New Zealand estimates the usual resident population for the district increased by 6,700 (9.8%) in the six years from 2013 to 2019, from 68,400 to 75,100¹.
- 6.2 Under the National Policy Statement for Urban Development Capacity 2016 Rotorua was identified as a “medium growth district”; and in line with this Rotorua is identified as a Tier 2 urban environment under the recently released National Policy Statement on Urban Development 2020 (NPS-UD 2020). This places specific requirements on Rotorua Lakes Council (RLC) to plan for future growth.
- 6.3 RLC’s Spatial Plan 2018 identifies that increases in population have recently put pressure on Rotorua’s housing market. TAGH agrees. In short, there are not enough homes being built for the number of additional people living in the district. Although there is a relatively

¹ See Section 42A Planning Report, Page 20, Para 6.3

large amount of zoned land already available for homes, this land is not being developed for several reasons, such as a lack of infrastructure capacity or because land is in multiple ownership, which can complicate decision making.

6.4 TAGH concurs with the Spatial Plan², where it states:

“... as population grows, and household size reduces because of aging, it is estimated an additional 17,000 homes may be needed by 2050 to accommodate an additional 30,000 people”.

6.5 The Spatial Plan identifies that in the short-term, RLC can undertake plan changes that will enable land to be used for new homes where there is existing infrastructure capacity to ensure costs are low and where land owners are willing to support development.

6.6 TAGH notes that under the Rotorua Housing Accord³ RLC has agreed to complete the spatial planning process and subsequent District Plan changes (including rezoning). Targets have been agreed to bring sections and dwellings to market. Housing Accords⁴ aim to set targets and actions to increase the immediate and longer-term supply of land, and therefore improve the affordability of housing.

6.7 TAGH agrees, subject to appropriate ‘checks and balances’, that the Pukehangi Heights Development Area as identified in the Spatial Plan⁵ can accommodate residential development in the short term.

6.8 As stated in the Section 42A Planning Report the residential development yield from the Pukehangi Heights Development Area is estimated to be within the range of 750 – 900 units. Actual yield

² Rotorua Spatial Plan 2018, Page 15

³ <https://www.hud.govt.nz/residential-housing/housing-affordability/housing-accord/rotorua-housing-accord/>

⁴ <https://www.hud.govt.nz/residential-housing/housing-affordability/housing-accord/>

⁵ Rotorua Spatial Plan 2018, Page 17

will depend on several factors, including the final allocation of land to stormwater management and lot sizes that are provided⁶.

- 6.9 The period over which this development could occur will depend on what share of growth is accommodated in the Pukehangi Heights Development Area.
- 6.10 Overall, TAGH concurs that there is a need to provide an improved supply of land for housing; and that the Pukehangi Heights Development Area has the potential to accommodate a significant part of the projected future demand for housing in Rotorua.
- 6.11 TAGH concurs with the purpose behind PPC2; that being to enable residential development to occur within the Pukehangi Heights Development Area in a comprehensively planned and integrated manner.
- 6.12 TAGH agrees with the proposed objectives, policies and place-specific principles, which seek to address landscape, urban design, cultural landscape and natural hazard risk management issues specific to the Pukehangi Heights Development Area; and that supplement the general objectives and policies for the Residential 1 and Rural 2 (Rural Lifestyle) zones.
- 6.13 TAGH agrees with the establishment of a structure plan to guide future development of land in relation to:
- landscape management;
 - urban design;
 - protection and enhancement of cultural values;
 - access and connectivity (including active transport modes);
and
 - stormwater infrastructure

⁶ See Section 42A Planning Report, Page 9, Para 2.6

7.0 TAGH'S SUBMISSION POINTS AND THE COUNCIL OFFICER'S RECOMMENDATIONS

Strategic Issues / Planning Framework

7.1 In relation to submissions made by TAGH on strategic issues underlying PPC2; I concur with the Council Officer's summary of the applicable planning framework, evaluation and recommendations⁷.

7.2 The purpose and intent of the NPS-UD 2020 is to ensure regional policy statements and district plans provide adequate opportunity for land development for business and housing to meet community needs.

7.3 In the context of these proceedings; the Bay of Plenty Regional Policy Statement contains the following objective and supporting policy:

Objective 23 – A compact, well designed and sustainable urban form that effectively and efficiently accommodated the regions urban growth.

Policy UG 17B – Urban growth management outside the western Bay of Plenty sub-region: Manage the growth of urban areas outside of the western Bay of Plenty sub-region in a manner consistent with sound resource management principles, including:

(a) The efficient development and use of the finite land resource

(b) Setting defined limits of urban development; and

(c) Providing for the efficient, planned and co-ordinated use and development of infrastructure.

7.4 In so far as the District Plan is concerned; the following policy framework is relevant:

⁷ See Section 42A Planning Report, Pages 24 – 27; Para's 6.22 – 6.41

Objective 1.3.5 – Sufficient and suitable land zoned for future urban development that provides the residents of Rotorua with a range of lifestyle and development choices.

Policy 1.3.5.1 – Ensure that development in the areas identified for new growth is carried out in a manner that meets the community’s needs and avoids, remedies or mitigates adverse environmental effects.

Objective 12.3.1 – Sufficient land area suited for future urban and economic development that provides the residents of Rotorua with a range of lifestyle and development choices.

Policy 12.3.1.1 – Identify areas within the district to meet future demand for residential development.

7.5 In my view, the Rotorua Spatial Plan 2018, while a non-statutory document, is also a relevant consideration in relation to PPC2 proceedings. The Rotorua Spatial Plan 2018 provides guidance for how Rotorua should grow, develop and change; and signals urban expansion in the general vicinity of the Pukehangi Heights Development Area⁸.

7.6 In my view, PPC2 ‘fits’ nicely within the applicable planning framework. PPC2 provides appropriate ‘checks and balances’ through objectives, policies and rules within the District Plan, which as a consequence will enable urban growth within the Pukehangi Heights Development Area in a comprehensively planned and integrated manner.

Lake Rotorua Nutrient Management

7.7 In relation to submissions made by TAGH on Lake Rotorua nutrient management; I concur with the Council Officer’s summary of submissions, the applicable planning framework, evaluation and recommendations⁹.

⁸ Rotorua Spatial Plan 2018, Page 17

⁹ See Section 42A Planning Report, Pages 27 – 30, Para’s 6.42 – 6.68; Pages 33 – 36, Para’s 7.19 – 7.31; Pages 69 – 74, Para’s 8.150 – 8.181

- 7.8 In my view, and in the view of TAGH, it is appropriate for PPC2 planning provisions to align with strategic direction in relation to Lake Rotorua nutrient management. I concur with the recommendations to add the following to the “general principles” in the Introduction (A5.2A.1)

Development that is designed within nutrient management limits and demonstrates no net increase in nitrogen entering Lake Rotorua

... and the following to “Objectives and Policies (A5.2A.2)

Objective 5: Pukehangi Heights Development Area – Nutrient Management – Development within the Pukehangi Heights Development Area results in no net increase in nutrient losses thereby contributing to water quality improvements in Lake Rotorua.

Water Quality and Stormwater

- 7.9 Following a review of the Section 42A Planning Report; TAGH concur that there is sufficient objective guidance already within the Operative District Plan and Regional Natural Resources Plan, coupled with the urban design integration objective and associated stormwater management policy to ensure low impact design principles are adhered to within the Pukehangi Heights Development Area and that offsite effects are adequately addressed¹⁰.

Landscape and Amenity

- 7.10 TAGH concur with the applicable planning framework, evaluation and recommendations within the Section 42A Planning Report insofar as landscape and amenity provisions are concerned¹¹.

¹⁰ See Section 42A Planning Report, Pages 36 – 37, Para’s 7.32 – 7.41; and Pages 87 – 90, Para’s 8.268 – 8.285

¹¹ See Section 42A Planning Report, Pages 44 – 54, Para’s 8.18 – 8.62

Culture, Archaeology and Heritage

- 7.11 Having reviewed the Section 42A Planning Report; TAGH concur with the stated background analysis, summary of submissions, applicable planning framework, evaluation and recommendations insofar as culture, archaeology and heritage provisions are concerned¹².
- 7.12 As a Te Arawa entity; TAGH supports the proposed amendments to PPC2 provisions, which support inclusive and meaningful consultation with tangata whenua.

Flooding and Stormwater

- 7.13 In relation to PPC2 and resource management considerations insofar as flooding and stormwater are concerned, I note the following statements within the Section 42A Planning Report, which 'set the scene' appropriately in my view ...

"The Pukehangi Heights Development Area lies within the Utuhina Stream Catchment and will discharge stormwater to the catchment. Changes from rural land use to urban land use will increase the volume of stormwater flows from a site due to increased impervious surfaces. As the Utuhina catchment already experiences flooding in downstream urban areas, managing potential changes in stormwater flows has been a key issue for the plan change ...

... the overall approach has been to design a stormwater system that is of sufficient capacity to mitigate downstream effect to not increase downstream flooding and erosion risk. The Structure Plan indicates the general layout of overland flow paths and attenuation ponds required to achieve this ...

... finalising the design of the stormwater management system for the Pukehangi Heights Development Area was constrained by incomplete information on the Utuhina catchment. An effective Catchment Management Plan for the total catchment required

¹² See Section 42A Planning Report, Pages 54 – 69

modelling to enable consideration of issues such as future development, current flooding risk, and climate change ...

... this work was underway, but not complete, at the time of notification of the plan change. This necessitated interim assumptions to be used as a basis for stormwater system design. Further catchment modelling and catchment management planning has since been advanced but has yet to be finalised. However, the indications from this further work is that onsite mitigation within the Pukehangi Heights Development Area will need to be significantly increased in scale from that shown on the Structure Plan to avoid increasing downstream flooding risk".¹³

- 7.14 TAGH's submission on this issue was that catchment modelling and associated planning be completed parallel to PPC2. This would enable plan provisions for the Pukehangi Heights Development Area to be drafted based on the most up to date information and would provide additional certainty for the development of the Pukehangi Heights Development Area. This would also ensure that any potential environmental effects are managed effectively and efficiently on a comprehensive basis across the Utuhiina catchment.
- 7.15 Having reviewed the Section 42A Planning Report and associated technical reports; there seems to be an ongoing dialogue between RLC, BOPRC and various stormwater experts as to the most efficient and effective way in which to manage flooding and stormwater effects as a consequence of PPC2?
- 7.16 TAGH generally accepts the findings and recommendations in the Section 42A Planning Report insofar as flooding and stormwater management is concerned; however, TAGH retain their view that this is one of the key resource management issues facing PPC2 and appropriate planning mechanisms need to be reviewed and established to (a) provide certainty for future development within the Pukehangi Heights Development Area and (b) ensure environmental effects are managed accordingly.

¹³ See Section 42A Planning Report, Pages 76 – 77, Para's 8.197 – 8.201

Transport and the Road Network

7.17 Having reviewed the Section 42A Planning Report, I concur with the Council Officer in relation to transport and road network considerations associated with PPC2.

7.18 TAGH support the subdivision performance standards for the Residential 1 and Rural 2 Zone to limit the number of dwellings that may be serviced by a road connecting with Matipo Avenue to 60 if no such connection between Area A and Area B is available at the time of subdivision (A5.2.3.4.11 and A5.2.4.4.7). For the purpose clarity this subdivision performance standard states:

(a) If no road connection is available between Area A and Area B, any road intersection connecting with Matipo Avenue from Area A may provide access for no more than 60 residential dwellings.

(b) If a road connection is available between Area A and Area B, the subdivision and development of Area A shall be designed such that any road intersection connecting with Matipo Avenue from Area A provides access for no more than 35 residential dwellings, or the equivalent number of vehicle trips during the evening peak hour established through traffic modelling methodology by a suitably qualified and experienced traffic or transportation engineer.

(c) Standard (b) above shall be deemed to be met where:

(i) A road intersection at Pukehangi Road/Malfroy Road is located generally as shown on the Pukehangi Heights Development Area Structure Plan; and

(ii) The indicative primary road in Area B up the mid-site escarpment is located generally as shown on the Pukehangi Heights Development Area Structure Plan.

7.19 TAGH agree with the Council Officer's statement ...

"It is considered that the plan change's approach to the connectivity between Matipo Avenue and future development in the plan change

*area is appropriate and no further changes are needed in response to the MARIS submission”.*¹⁴

- 7.20 For context on this issue, TAGH agrees with the following excerpts from the Section 42A Planning Report ...

“During the development the plan change a multi-criteria assessment and the Stantec Traffic Assessment were used to consider various road layout options and supports the structure plan and rules included in the plan change. Furthermore, the Stantec Traffic Assessment concludes that the layout provided for in the structure plan will result in less vehicle movements on Matipo Avenue that those enabled under the existing provisions for Twin Oaks in the current District Plan; it will be quicker for almost all of the traffic from Area A to access Pukehangi Road using the upper link to Area B than to travel along Matipo Avenue to use the lower connection with Area B ...

... the increase in traffic on Matipo Avenue will be greater in the event that Area A is developed before Area B and the connection to Area B is not yet available. However, the traffic assessment estimated that the traffic enabled by the Twin Oaks development provisions is equivalent to around an additional 70 dwellings. Therefore, the proposed plan change provisions, which limit development on Area A to 60 dwellings where no connection to Area B is available, are expected to result in similar levels of traffic. The Stantec Traffic Assessment also notes that with this limited amount of development Matipo Avenue will comply with RLC’s engineering standards for traffic volumes and carriageway widths with respect to the carriageway width of Matipo Avenue (8.0m to 8.5m) ...

... MARIS, in support of their preference for a road layout that directs traffic from Area A through Area B rather than Matipo Avenue, refer to the potential for additional traffic to exacerbate substandard stopping distances and substandard vertical and horizontal alignments. However, the safety audit conducted by

¹⁴ See Section 42A Planning Report, Page 106, Para 8.383

Harrison Transportation in 2015 and referred to in the Stantec Traffic Assessment found only minor non-compliance with stopping sight distances and suggested a stop sign at the intersection of Pukehangi Road and Matipo Avenue was warranted. This would no longer be required once the connection was severed ...

... MARIS are also concerned about safety, privacy and amenity. However, it is considered that the benefits of connectivity, while difficult to quantify, are also important. Such benefits include resilience (providing alternative travel options), greater recreational opportunities for walking/cycling and the potential to enhance travel efficiency and reduce energy consumption for example associated with deliveries, mail and rubbish collection ...”¹⁵

- 7.21 Overall, it is my view that the transportation and road network provisions for PPC2 are appropriate in that they recognise in a quantitative and qualitative manner traffic generation both now and in the future subsequent to development of Area A. The provision for appropriate connectivity in urban environments rather than severance is also an important consideration; particularly under best practice urban design principles.

Construction Effects

- 7.22 Mr Graham Norman, Principal Transport Consultant at Commute Transportation Consultants Limited, has prepared a statement of evidence on behalf of TAGH, which relates to the issue of construction access to Area A and the retention of Matipo Avenue as an option for such.
- 7.23 The Section 42A Planning Report correctly states that there is both support and opposition for broadening the subdivision performance standard that requires a construction traffic management plan for Area A, with respect to also allowing construction access via Matipo Avenue as an option to meet the standard¹⁶.

¹⁵ See Section 42A Planning Report, Page 107, Para's 8.384 – 8.387

¹⁶ See Section 42A Planning Report, Page 123, Para 8.463

7.24 The Section 42A Planning Report also states the following:

It is acknowledged that access for construction traffic for Area A through Area B relies on negotiation between neighbouring blocks or delaying the development of Area A until after Area B is developed and the structure plan road is provided. Access from Great West Road is likely to have high construction costs. Matipo Avenue provides greater independence for the TAGH block and may, therefore, be more attractive to those developing Area A ...

However, the multi-criteria assessment has suggested that access via Matipo Avenue is the least preferred option. Therefore, it is appropriate to retain the proposed performance standard. Should access via Matipo Avenue be promoted it would need to be assessed as a discretionary activity given it does not meet the performance standards ...”¹⁷

7.25 I note that Mr Graham Norman reaches the conclusion in his evidence that from a traffic engineering perspective, there are no critical issues or effects which would exclude the option to use Matipo Avenue for construction traffic that could not be managed by a typical construction traffic management plan.

7.26 I further note the comment within the Stantec Transportation Assessment dated August 2020, which states:

*“It is premature to consider construction traffic volumes at the time of a plan change. A Construction Management Plan will be needed as part of resource consents prior to subdivision approval, and this will depend in turn on the way in which each property is developed”.*¹⁸

I concur with this statement from Stantec. Construction traffic and the effects of such should ideally be dealt with at the time of subdivision and development where more certainty as to actual and potential temporary construction effects are known; not at the plan

¹⁷ See Section 42A Planning Report, Page 123, Para’s 8.464 – 8.465

¹⁸ See Stantec Transportation Assessment, dated August 2020, Page 10, Para 3.6 – Construction Traffic

change stage. To make the Matipo Avenue option for construction access a discretionary activity at this plan change stage is inappropriate; particularly given the assessment and conclusions reached by traffic experts on the issue of construction access via Matipo Avenue.

7.27 In my opinion, the relief sought by TAGH in relation to this issue is appropriate. For the purpose of clarity; this relief is set out below:

A5.2.3.4 (12) to be revised with amended wording as follows:

For the subdivision and development of Area A, construction traffic shall gain access via either:

- (a) Area B from Pukehangi Road;*
- (b) Matipo Avenue; or*
- (c) An access road from Great West Road.*

a-A Construction Traffic Management Plan shall be submitted, which shall include (but not be limited to):

- *Pavement rehabilitation conditions and monitoring*
- *Temporary speed limits*
- *Parking restrictions*
- *Hours of operation*
- *Details of truck wash facilities*
- *Application of turning restrictions and truck routes*

~~that includes measures such that:~~

- ~~(a) All construction traffic is restricted from gaining access from Matipo Avenue, other than for the purpose of constructing an intersection with Matipo Avenue;~~*
- ~~(b) All construction traffic gains access from a temporary access road from the Great West Road boundary or Area B from Pukehangi Road, other than for the purpose of constructing an intersection with Matipo Avenue; and~~*
- ~~(c) Prior to commencing construction, signage is erected and displayed and maintained on and near the entrance of Matipo Avenue during construction of the development advising of the restrictions on construction traffic using Matipo Avenue for access and directing such traffic to the approved site access.~~*

To avoid doubt, “construction traffic” means heavy and light vehicles associated with subdivision and development, including but not limited to earthworks and the construction of infrastructure, but does not include traffic associated with construction of residential buildings and structures in the Development Area.

- 7.28 With the above-mentioned plan provisions any construction access option to Area A, whether that be via Great West Road, Matipo Avenue or Area B, would clearly be subject to a range of 'checks and balances' to ensure traffic safety and convenience and the maintenance of amenity values at the time of construction.
- 7.29 In relation to the construction access option via Great West Road; it is relevant to note that TAGH has recently consulted with Ngati Kea Ngati Tuara and Te Arawa Lakes Trust (TALT). Both parties relayed significant concerns over the environmental impacts of construction directly adjacent to the Utuhina Stream and highlighted inconsistency with wider subdivision principles and objectives.

Activity Status

- 7.30 Having reviewed the Section 42A Planning Report, TAGH agree with the conclusions and recommendations made by the Council Officer¹⁹.
- 7.31 The restricted discretionary activity status is appropriate due to the scope of discretion required by RLC in relation to matters, including landscape values in escarpment transition areas, stormwater management, natural hazard management, cultural effects and traffic issues.

Pre-Intensification Subdivision

- 7.32 As for the issue of activity status above; having reviewed the Section 42A Planning Report, TAGH agree with the conclusions and recommendations made by the Council Officer²⁰.

Pre-intensification subdivision, being solely for the purpose of ownership transfers to enable future development, would lead to no change of use. On that basis, I concur that such subdivision would have no environmental effects provided the neutral land use outcome was secured via controls such as covenants or consent notices; I further agree that the potential issue from land

¹⁹ See Section 42A Planning Report, Page 145, Para's 8.590 – 8.594

²⁰ See Section 42A Planning Report, Pages 145 – 147, Para's 8.597 – 8.608

fragmentation inhibiting the delivery of structure plan outcomes (e.g. key road linkages or services) could be addressed through master planning to prove the new parcels would not inhibit long term outcomes.

8.0 CONCLUSION

8.1 TAGH agrees subject to appropriate 'checks and balances', that the Pukehangi Heights Development Area as identified in the Rotorua Spatial Plan 2018 can accommodate residential development in the short term.

8.2 Overall, TAGH concurs that there is a need to provide an improved supply of land for housing; and that the Pukehangi Heights Development Area has the potential to accommodate a significant part of the projected future demand for housing in Rotorua.

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