

NORTHLAKE INVESTMENTS LIMITED

Request for a Change to the Proposed Queenstown Lakes District Plan

Evaluation under section 32 of the Resource Management Act 1991

9 October 2026

BROWN&COMPANY
P L A N N I N G G R O U P



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1. Introduction

1.1 Preliminary

Northlake Investments Limited (**NIL**) is requesting a change (the **Request**) to the Queenstown Lakes Proposed District Plan (**PDP**) to incorporate an area of land (the **Site**¹) within the residential development known as Northlake, Wānaka, being part of an existing Queenstown Lakes Operative District Plan special zone, the 'Northlake Special Zone' (**NSZ**) into the PDP, with the inclusion of a proposed Structure Plan for residential development in the northwestern part of the NSZ, and the delineation of the Outstanding Natural Landscape (**ONL**) classification within the Site.

DOCUMENT 1 sets out the background to, and reasons for, the Request. The amendments requested to the PDP are set out in **DOCUMENT 2**. The effects on the environment (**AEE**) are assessed in **DOCUMENT 3**.

Any change to a plan needs to be evaluated in accordance with Section 32 (**s32**) of the Resource Management 1991 (the **Act**). This document (**DOCUMENT 4**) sets out the s32 evaluation for the Request.

Section 32 states:

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and**
- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—**
 - (i) identifying other reasonably practicable options for achieving the objectives; and**
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and**
 - (iii) summarising the reasons for deciding on the provisions; and**
- (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.**

(2) An assessment under subsection (1)(b)(ii) must—

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—**
 - (i) economic growth that are anticipated to be provided or reduced; and**
 - (ii) employment that are anticipated to be provided or reduced; and**
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and**
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.**

(3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) 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—**

¹ See **DOCUMENT 1** for a description of the Site.

- (i) *are relevant to the objectives of the amending proposal; and*
- (ii) *would remain if the amending proposal were to take effect ...*

The evaluation relies on the description and other information provided in [DOCUMENT 1](#), the various supporting technical reports ([DOCUMENTS 5 – 11](#)) and the AEE ([DOCUMENT 3](#)), noting that the AEE relies on the supporting technical reports.

1.2 Statutory context and background

The Northlake development (being a portion of the NSZ) has been owned and developed by one entity, NIL. Northlake is subject to a special zoning, the NSZ, which provides a zoning framework for the development of a predominantly residential mixed-use neighbourhood offering a range of residential densities and housing choices, located in a manner which reflects the characteristics of the land and its proximity to Lake Wānaka,

The NSZ was promulgated by way of privately initiated plan change (known as Plan Change 45) applying to approximately 220 hectares of land located between Wānaka and Albert Town to enable the development of approximately 1500 residential homes. The NSZ was included as part of Section 12 (Special Zones) of the Operative District Plan (**ODP**) and became operative in December 2015. The NSZ was implemented through a Structure Plan identifying different Activity Areas, and progressively implemented by way of Outline Development Plan approval (as required by the NSZ rules) to provide a high-level overview of a large urban development.

The QLDC's review of the ODP has been in stages, with Stage 1²) publicly notified in August 2015; Stage 2³ notified in November 2017; and Stage 3⁴ notified in September 2019.

The adjoining land to the east of the Site known as "Sticky Forest", a large undeveloped area, was notified in Stage 1 of the PDP review as Rural Zone, and utilised for forestry and recreation (mountain biking) purposes. Following an appeal, the Environment Court in 2024 confirmed the rezoning of part of this land to Suburban Residential and Large Lot Residential under the PDP, and subject to a site-specific structure plan⁵.

In addition to the staged rolling review, the Council has also undertaken variations to PDP zoned land to implement national direction where required. Of most relevance is the Urban Intensification Variation (**UIV**) which was notified in 2023 to implement Policy 5 of the National Policy Statement for Urban Development (**NPS-UD**) to enable more height and density in certain locations. Decisions on the UIV were notified in February 2026. Notably the UIV did not apply to the remaining ODP zones, with the Council's stated approach to these ODP "legacy" zones to be to implement the NPS-UD at the time each ODP zone is reviewed through its district plan review work programme.

A review of the ODP Special Zones (which includes the NSZ among others) to be transitioned into the PDP was intended to form part of Stage 4 and the Council announced that a review was underway in February 2025. The reporting undertaken by Council in accordance with the requirements of Section 35 of the Act (**Monitoring Report**) is included as [APPENDIX A](#) to this document. The Council had commenced consultation with NIL with respect to the NSZ's

² Strategic Direction, Urban Development, Landscape, Tangata Whenua, Subdivision, Natural Hazard, Indigenous Vegetation, Temporary Activities and Relocated Buildings, Protected Trees, Noise and Heritage Chapters, High, Medium and Low Density Residential Zones, Large Lot Residential Zone, Business Mixed Use Zone, Local Shopping Centre Zone, Rural, Rural Residential and Rural Lifestyle Zones, Jacks Point and Millbrook Zones, Arrowtown Residential Historic Management Zone

³ Earthworks, Transport and Signs Chapters, Open Space and Recreation Zones, Wakatipu Basin Rural Amenity Zone, and provisions relating to Visitor Accommodation and some consequential changes to Stage 1 Chapters

⁴ Wahi Tupuna, Township Zones, Residential Design Guidelines, Industrial A and B Zones, Rural Visitor Zones, Ballantyne Road Mixed Use Zone and Three Parks Special Zone

⁵ [2026] NZEnvC 6

transition into the PDP, however on 16 July 2025 the Government announced a “plan stop” regime to pause councils’ work on review and change to their Resource Management Plans. From 21 August 2025, no new draft planning instruments can be notified by councils (other than for discrete exceptions). This does not restrict private plan changes accepted by Council which can proceed to notification under Clause 26 of Schedule 1 of the Act. Since the “plan stop” regime came into force, NIL has continued engagement with Council to progress a private plan change to incorporate the Site into the PDP.

Since its promulgation via Plan Change 45, the Site has been significantly developed largely (estimated at 80-90% complete) in accordance with its Structure Plan (including as modified by two further plan changes, Plan Change 53 and Plan Change 54 as addressed in [DOCUMENT 1](#)). Development has been guided by the Structure Plan, Outline Development Plan provisions, and developer-imposed design guidelines⁶.

As set out in the Monitoring Report, 62% of monitored resource consents undertaken within the NSZ were for new developments and 20% were undertaken to subdivide existing lots, consistent with the development of a new zone. The key findings of the Monitoring Report include:

- (a) Of the lots created at the time of Council monitoring, 74% of lots have been developed, 6% were under construction, and 20% remain undeveloped in a manner consistent with the staged development of the NSZ;
- (b) The majority (67%) of consents were for residential purposes, consistent with the development of the land as primarily an urban residential zone;
- (c) Consent status was equally split across the Controlled, Discretionary and Non-Complying Activity statuses (approximately 20% each) with Restricted Discretionary Activity status making up the largest proportion of consents sought (38%);
- (d) The reason for Non-Complying Activity consent status was widely varied, but the most common breach related to subdivision and the provision of affordable housing (Rule 15.2.20.1). Affordable housing was established in NSZ in 2023, demonstrating that the outcome sought was achieved, although the method and timing set out in the provisions may not have aligned with practical development realities; and
- (e) Breaches of standards resulting in Non-Complying Activity status related to maximum building coverage, maximum building height, and building materials and their light reflectance values.

Overall, the Monitoring Report found the NSZ is successfully achieving its intended outcomes relating to landscape and amenity; community outcomes; ecology; open space and recreation and efficient land use. It noted that objectives and policies that were less effective related to the sequencing and timing of the provision of community facilities and affordable housing.

1.3 Resource management issues

The evaluation of the appropriateness of the Request is based upon addressing a number of resource management issues.

The following key resource management issues for the NSZ have been identified.

Changes in the statutory and plan-making environment

Ideally the Council review of the ODP Special Zones, including the NSZ, would have continued on from its initiation in 2025 and would have resulted in a Council-initiated change to incorporate the land into the PDP. The form and manner in which that occurred would have been proposed

⁶ Included within the Design Statement included as [DOCUMENT 6](#)

by the Council. NIL has however been in close consultation with the Council in the early stages of stakeholder engagement and in progressing this Request, and it has been conveyed that the policy intention is that the Stage 4 review would have involved the use of standardised PDP zones where these could appropriately be applied, rather than a continued special zone approach. This assessment would have enabled policy direction changes notified following the previous private plan changes (such as Policy 5 of the NPS-UD or the National Planning Standards) to be considered and implemented. Once notified, NIL would have (along with any member of the public) been entitled to submit on the proposal and be heard through the usual statutory process under Schedule 1 of the Act.

The uncertainty arising from proposed changes to resource management legislation at the central government level has left the NSZ in a holding pattern, utilising an original zoning approach that is now 11 years old (older than the statutory review requirement of 10 years as set out in the Act⁷) and no longer reflects planning best practice. For example, the NSZ provisions include a status of Restricted Discretionary for Residential Activity in Activity Areas B and C, with the only matter of Council discretion being the provision and assessment of an Outline Development Plan⁸ for all of the relevant Activity Areas. While this method may have been appropriate for a new greenfield urban zone to ensure integration of key infrastructural items, it no longer reflects the established nature of the NSZ, and the activity status of Restricted Discretionary for Residential Activity does not align with the purpose of the zone to provide for a predominantly residential mixed use neighbourhood.

This is one example of the inefficiencies of the operative zoning regime, however, development within the NSZ continues to be bound by these provisions until such time as they are reviewed. Requiring resource consent for Residential Activity in an urban residential zone purely for the purpose of receiving information which is no longer required is not efficient.

In addition, this delay in review means other, more settled, national policy direction has not yet been implemented. As noted above, Policy 5 of the NPS-UD, which came into effect in 2020 (post Plan Changes 45 and 53) required Tier 2 authorities (including Queenstown Lakes) to update their plans to enable heights and density of urban form commensurate with either the level of accessibility by existing or planned active or public transport to commercial and community facilities, or relative demand for housing and business use in that location (whichever is greater).

The Council's UIV was notified in 2023 and decisions released in February 2026. The ODP urban 'special zones' were deliberately excluded from assessment in the UIV, with the Section 32 report noting "*Policy 5 will be a matter of consideration for the review of these ODP zones in the future, when they are brought into the PDP⁹.*" Regardless of the outcome and notwithstanding the relatively small area of the District the Site comprises, it is important that this assessment be undertaken especially noting the timeframes in the NPS-UD for this work to be notified was by 20 August 2022.

Changes in the receiving environment

As mentioned in 1.3.1 above, the provisions of the NSZ are drafted and designed to be applied to greenfield land (as the Site was at the time of the promulgation of the zone). As evidenced on the ground and set out quantitatively by the Monitoring Report, the Site is now significantly developed in accordance with the outcomes sought by the NSZ objectives. This includes comprehensive residential (and some commercial) development, including earthworks, built form, infrastructure and landscaping, that has changed a previously largely pastoral landscape into a relatively modified urban area.

⁷ Acknowledging that subsequent plan changes (as described in [DOCUMENT 1](#)) are younger than this.

⁸ Defined in the ODP as *Means a plan within a zone or over an area of land or a site which delineates the performance standards and/or activities in the identified areas of the zone, or on the site or area of land.*

⁹ [Section 32 Evaluation Report for Implementing Policy 5 of the National Policy Statement on Urban Development Urban Intensification Variation](#), 16 May 2023, page 18

In addition to development within the NSZ, zonings in the surrounding area have changed. Through the district plan review process the previously Rural Residential zoned land (4000m² lot size) on the southwestern boundary of the Site is now zoned Large Lot Residential A (1500m² lot size). The land to the west known as Sticky Forest has recently had an urban residential zoning (Suburban Residential and Large Lot Residential) confirmed by the Environment Court, meaning the existing rural nature on this boundary of the Site is anticipated to change significantly in the future.

These changes mean that the landscape sensitivities that the NSZ provisions seek to address (including through the Structure Plan demarcations, location of Activity Areas, densities, and boundary treatment requirements) have changed over time. Retention of all of the current provisions may no longer be efficient or necessary to achieve objectives of the PDP for this Site in light of the changed receiving environment.

Efficient land use

The focus of this Request has primarily been on the technical implementation of provisions that provide a mix of land uses, rather than to reconsider the distribution, scale or intensity of each land use within the NSZ. However, as a result of the changes to both the planning context and the receiving environment noted above, a key resource management issue faced by NIL is ensuring that appropriate land uses can occur in the most efficient manner. As development progresses both on the Site and beyond, more efficient utilisation of land could be possible in the northwestern part of the zone.

The land within the northwestern part of the Site (Activity Area E1 and an embedded parcel of Activity Area C1) is effectively a basin or depression surrounded by higher land on four sides, with two discrete patches of kanuka vegetation and some scattered vegetation in the gully areas. Under the existing NSZ Structure Plan, it serves the purpose of providing a buffer of “natural character”¹⁰ between the NSZ and the (at that time) surrounding Rural Zone land. The land has been significantly re-shaped as part of the earthworks required for the various stages of residential development in order to achieve appropriate buildable grades and a cut/fill balance across the site and construct pedestrian and cycle trails. To the west of the northern section of Activity Area E1 is the recently rezoned Sticky Forest area, which is anticipated to be subject to the removal of the existing cover of conifer trees to implement the zoning. This will be a substantial and recognisable change in the views and perception of the area. To the south and east is the partially developed (subdivided but not yet constructed) residential area of NSZ Activity Areas B6 and C1.

In Wānaka, land that has a combination of attributes that make it suitable for zoning to accommodate population growth is scarce. These attributes include being physically suitable for development (including from a topographical and serviceability standpoint), being adjacent or proximate to existing urban areas within an Urban Growth Boundary (UGB), not subject to a landscape classification and able to be developed without compromising natural values, and able to provide access to amenities to serve the local population. Given that the Activity Area E1 and C1 land has all of these attributes, avoiding development of this land entirely, or development of this land in an ad hoc manner via resource consent, would be an inefficient use of that land and a loss of opportunity for urban infill in an appropriate location, which could otherwise provide for a meaningful amount of additional housing supply.

Urban design

¹⁰ Policy 4.2 of the Northlake Special Zone: “To maintain and enhance the nature conservation values of remnants of indigenous habitat, and to enhance the natural character of the northeast margin of the zone.”; and Paragraph 2.5 of Landscape and Urban Design Assessment prepared by Baxter Design Group Ltd for Plan Change 53 dated October 2017 states “Within the existing Structure Plan, the residential density decreases as the land rises above and behind the ridge to the west, culminating in AA-E1, an area that was established to protect the steeper, more visible landscapes of the ridge that fronts Outlet Road and the land that adjoins Sticky Forest at the northwest corner of the NSZ.”

The creation of the NSZ originally resulted in a capacity of approximately 1500 homes (although this has since increased through later plan changes and resource consent decisions), provided for across the various Activity Areas with their range of densities. The provisions for these Activity Areas require a strong focus on amenity and quality urban design.

Under the NSZ provisions, development within the Site has been designed and consented through Outline Development Plans and subdivision consent processes to achieve urban design outcomes relating to connectivity, amenity, safety, density and neighbourhood structure. The way that Outline Development Plans have been implemented to date within the NSZ has resulted in multiple Outline Development Plans being approved, with occasional Non-Complying Activities sought in relation to these, but generally these have achieved the outcomes sought by the zone¹¹.

At the individual lot and building level, the Northlake Design Controls (attached to **DOCUMENT 6**) are the primary method for achieving a high level of urban design and are generally more onerous than built form standards contained in the NSZ provisions. As these are legally registered instruments on the Record of Title of any residential lot, they will continue to be applicable regardless of the zone that applies to the Site, and regardless of whether resource consent is required.

As development of the Site is 80-90% complete, significant changes to the established urban form is now unlikely and the high quality of the urban design and the character and cohesion this gives “Northlake” as a neighbourhood is likely to be safeguarded, together with the legal mechanism of the design controls (via land covenant), without the need for several bespoke building standards at the District Plan level.

2. Section 32(1)(a): the purpose of the Act, objectives of the proposal, options and examination

2.1 Purpose of the Act

The purpose of the Act is set out in Section 5 of the Act:

5 Purpose

- (1) The purpose of this Act is to promote the sustainable management of natural and physical resources.**
- (2) In this Act, 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 while —**
 - (a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and**
 - (b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and**
 - (c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.**

The purpose of the Act is to promote the sustainable management of natural and physical resources. This has an enabling component (using, developing and protecting resources to enable wellbeing) and a regulating component (sustaining the potential of resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-supporting

¹¹ Monitoring Report, p22. Note that since the promulgation of the NSZ, the Environment Court has raised issue with Outline Development Plans, specifically where they do not implement a land use. There are no PDP zones that utilise Outline Development Plans as a method.

capacity of air, water, soil, and ecosystems; and avoiding, remedying, or mitigating any adverse effects of activities on the environment).

The purpose is given effect to by the hierarchy of national, regional and district-level planning instruments. These are addressed in more detail in Parts 6 – 8 below. In summary, the NPS-UD requires all councils that have all or part of an urban environment within their district or region to plan well for growth and ensure a well-functioning urban environment for all people, communities, and future generations. This includes ensuring that plans make room for growth, and that rules are not unnecessarily constraining growth.

At the regional level, the Otago Regional Council's (**ORC**) operative Regional Policy Statement 2021 (**RPS21**) objectives and policies contain two key themes relevant to this plan change:

Urban development	The urban form and function of urban areas should reflect the changing needs of people and communities now and in the future; development of urban areas should be well designed and located in and around existing urban areas to accommodate urban growth and change; sufficiency of development capacity; and intensification within urban areas and urban expansion should contribute to maintaining the qualities of a well-functioning urban environment;
Landscape values	The relevant landscape provisions seek to protect outstanding natural features and landscapes; and maintain or enhance highly valued natural features and landscapes.

At the district level, the themes of the higher order chapter of the PDP that are relevant to this plan change are:

Urban Growth	Provide for logical urban development and growth so as to promote a compact, well designed and integrated urban form that achieves a desirable, healthy and safe place to live, work and play.
Landscape values	Protecting the landscape values of outstanding natural features and landscapes from inappropriate subdivision, use and development.

The Queenstown Lakes Spatial Plan (**Spatial Plan**) statistics predict that the average day population (residents) in the Upper Clutha is projected to increase from approximately 13,500 in 2021 to 28,500 in 2051¹². Projected growth in residents translates to demand for additional dwellings in the district, and additional land to accommodate dwellings, whether by infill within existing urban areas or expansion into new areas.

2.2 Objectives of the proposal

NIL's overall objectives¹³ are:

- (a) To provide for a more efficient and updated planning regime for the NSZ land, one that reflects both the developed urban form and its existing character while recognising that part of the Site is still to be developed in a connected and comprehensive way; and

¹² The Queenstown Lakes Spatial Plan, July 2021, p15

¹³ "Objectives" in this context are the goals or purposes of the plan change (as opposed to a formal objective in the planning instrument's provisions under s75(1)(a) of the Act).

- (b) To infill the land area available for urban residential development in the northwest part of the NSZ; and
- (c) Establish the identification of the Outstanding Natural Landscape (**ONL**) boundary in relation to the Site.

In relation to (a) above, NIL proposes to utilise standard PDP zonings across the land subject to the Request.

In relation to (b) above, the northwest part of the Site currently comprises Activity Area E1 (acting as open space and in which built development is not anticipated by the NSZ provisions) and pockets of Activity Area C1. The land has been significantly re-shaped as part of the previous earthworks required for the various stages of the Northlake development, to achieve a cut/fill balance across the site and construct pedestrian and cycle trails. The topography of the land, its serviceability, and its location mean it has the capacity to absorb additional development, particularly in light of the change to the receiving environment (the rezoning of Sticky Forest) which means the previous purpose of Activity Area E1 in providing a transition between urban Northlake and the Sticky Forest recreation areas is now redundant.

2.3 Options under s32(1)(a)

The duty under s32(1)(a) is to examine the extent to which the objectives of the proposal being evaluated are the *most appropriate way to achieve the purpose of the Act*. In determining whether the objectives of the proposal are the *most appropriate*, it is necessary to compare the objectives to other potential options. In this case there are three options to be examined under s32(1)(a):

- The status quo – retaining the current NSZ ODP zoning;
- Requesting a change to the ODP to amend the existing NSZ provisions and Structure Plan;
- Requesting a change to the PDP to introduce the land into the PDP.

These options are examined below.

2.4 Examination of the options

Status quo

The status quo will retain the current NSZ plan provisions and Structure Plan within the ODP. This option has the advantage of not requiring a private plan change, thereby avoiding the transaction costs of that process, but it presents the following disadvantages:

- (a) The need for review and incorporation of this ODP special zone into the PDP remains an obligation on the Council to undertake in the future, including the costs associated with it;
- (b) There would remain no demarcated ONL annotation within the Site and a 'gap' in the wider ONL boundary;
- (c) Residential subdivision and development within Activity Area C1 would likely be subject to a non-complying activity resource consent for a development that avoids a suboptimal and disjointed development outcome;

- (d) Residential subdivision and development within Activity Area E1 is not anticipated and would require a non-complying activity resource consent; and
- (e) It would represent an inefficient use of that part of Activity Area E1 that has capacity to absorb additional residential development within the existing UGB and which is not subject to a landscape classification.

Plan change request to the ODP

Requesting a change to the ODP NSZ provisions and Structure Plan will have the advantage of the ability to infill the area available for urban residential development in the northwest part of the NSZ, but has the following disadvantages:

- (a) The need for review and incorporation of this ODP special zone into the PDP remains an obligation on the Council to undertake in the future, including the costs associated with it;
- (b) There would be no ability to annotate the ONL demarcation (as this is not included on ODP planning maps) in a logical manner consistent with ONL annotations on adjoining properties; and
- (c) The age of the NSZ and ODP in general means that any change would not be viewed through the more modern strategic lens of the Council and community as set out in the higher order chapters and approach of the PDP and more recent regional and national policy documents.

Plan change request to the PDP

Requesting a change to the PDP to transition part of the NSZ into the PDP will have the disadvantage of the transactional costs of a private plan change now and further plan change (either as a private or Council-initiated) for the remaining NSZ land, but has the following advantages:

- (a) It is an efficient planning approach to reviewing the NSZ provisions and providing an updated planning regime for this land under the more modern higher order policy direction of the PDP;
- (b) The ONL demarcation can be clearly annotated on planning maps in a logical manner consistent with ONL annotations on adjoining properties;
- (c) It will expand the area available for urban residential development in the northwest part of the NSZ and will contribute to the PDP's response to the NPS-UD and RPS imperatives for providing land for accommodating growth;
- (d) It will not cause adverse effects on the environment that cannot be appropriately avoided, remedied or mitigated, as discussed in the various reports submitted in support of this request, including for landscape¹⁴, urban design¹⁵, ecology¹⁶, traffic¹⁷, and infrastructure¹⁸ and in the assessment of effects on the environment ([DOCUMENT 3](#)).

¹⁴ Landscape Assessment, prepared by RMM Landscape Architects, dated 8 October 2026
¹⁵ Urban Design Statement, prepared by Northlake Investments Ltd, dated 14 September 2026
¹⁶ Ecological Assessment, prepared by Wildlands Consultants, dated 5 May 2026
¹⁷ Transport Assessment, prepared by Carriageway Consulting, dated 8 October 2026
¹⁸ Infrastructure Report, prepared by Paterson Land Professionals, dated 17 June 2026

2.5 Summary

On the basis of the examination in Part 2.4 above, the objectives of the proposal are best achieved by way of a plan change request to the PDP and this is the most appropriate way to achieve the purpose of the Act. The Request achieves the sustainable management purpose of the Act by enabling appropriate activities and development, and accordingly social and economic well-being, in a manner that:

- (a) sustains and enhances the potential of the natural and physical resources of the Site and the wider Upper Clutha, for future generations;
- (b) will continue to safeguard the life-supporting capacity of air, water, soil, and ecosystems; and
- (c) will avoid or mitigate potential adverse effects including effects on landscape and visual amenity values.

3. Evaluation of the costs and benefits of the options

3.1 Evaluation

A plan change request to rezone ODP land into the PDP gives rise to a number of options to be examined under s32(1)(a):

- (1) Rezone to one existing PDP zone that most closely reflects the nature and density of the majority of the Site (such as Suburban Residential Zone). This would rezone the land and apply the existing provisions within this zone to the land.
- (2) Rezone to a mix of existing PDP zones that most closely reflect the nature and densities of the various NSZ Activity Areas (including the Suburban Residential Zone, Medium Density Residential Zone, Large Lot Residential Zone, Local Shopping Centre Zone and an Open Space Zone). This would rezone the land and apply the existing provisions within these zones to the land.
- (3) Rezone to a mix of existing PDP zones that most closely reflect the nature and densities of the NSZ Activity Areas (including the Suburban Residential Zone, Medium Density Residential Zone, Large Lot Residential Zone, Local Shopping Centre Zone and an Open Space Zone) with additional location-specific provisions to address any particular characteristics of the land that warrant protection. This could include objectives, policies and rules, and the use of a Structure Plan to spatially identify any outcomes to be achieved in the part of the Site that is appropriate for additional residential development.
- (4) Rezone to one new PDP Special Zone for urban purposes, including new location-specific objectives, policies and rules to address development¹⁹.

The costs and benefits of Options (1) (2), (3) and (4) are addressed in **Table 1** below.

¹⁹ All of Options (1) through (4) would result in the PDP District-Wide provisions applying to the Site also, to the extent that they apply to the zones considered via each option.

Table 1: Costs and benefits of Options 1-4

	Option 1: Rezone the Site to one existing PDP zone and apply existing provisions	Option 2: Rezone to a mix of existing PDP zones and apply existing provisions	Option 3: Rezone to a mix of existing PDP zones and apply both existing provisions and additional location-specific provisions	Option 4: Rezone the Site to one new PDP Special Zone for urban purposes
Costs	(a) Foregoing higher density development opportunities in appropriate locations (where these have not already been utilised) is not an efficient use of the land. (b) Would not appropriately provide for activities currently anticipated within parts of the NSZ (such as community and small-scale retail activities) and which provide benefits to its inhabitants. (c) Related to (b) above, transaction costs for resource consent applications, and the uncertainty that such applications may not be granted, for activities that are otherwise anticipated within some parts of the NSZ.	(a) Potential for key features or development aspirations (ie. urban design outcomes and landscape integration) to be lost through the application of generic provisions. (b) Potential for ad hoc development / losing the ability to implement the coordinated master-planned nature of that part of the Site that is yet to be developed.	(a) Could add some complexity and length to the existing PDP Chapters to insert location-specific provisions that address any resource management issues that are specific to this location.	(a) Could be seen to be contrary to the directions of the National Planning Standards as the land use activities or anticipated outcomes of the Site are unlikely to meet the criteria for an additional special purpose zone in the mandatory zone framework standards. (b) Added plan complexity and length through the inclusion of a new chapter and subsequent amendments to existing chapters.
	<i>Costs common to all options:</i> (a) Costs to NIL for the drafting of the private plan change request and supporting reports; (b) Costs to NIL for funding the Council-appointed independent consultants or internal planning staff to process the private plan change; (c) Potential costs to the community in participating in the plan change process; (d) Costs in relation to the change to the expected layout of development and the potential adverse landscape effects from the expanded area of urban residential development, however these have been assessed and found to be no more than low. This is addressed in more detail in DOCUMENT 3.			
Benefits	(a) None beyond the benefits common to all options listed below.	(i). Would not add to the length or complexity of the PDP.	(a) Would enable a comprehensive, co-ordinated urban development that takes into account and integrates with landscape values, ecological values,	(a) Would enable a comprehensive, co-ordinated urban development that takes into account and integrates with landscape values, ecological values, and existing suburban development.

	Option 1: Rezone the Site to one existing PDP zone and apply existing provisions	Option 2: Rezone to a mix of existing PDP zones and apply existing provisions	Option 3: Rezone to a mix of existing PDP zones and apply both existing provisions and additional location-specific provisions	Option 4: Rezone the Site to one new PDP Special Zone for urban purposes
			and existing and zoned suburban development. (b) Would enable retention of identified key features, such as existing areas of vegetation to be retained, and/or the establishment of key outcomes for new development.	(b) Would enable retention of identified key features, such as existing areas of vegetation to be retained, and/or the establishment of key outcomes for new development.
	<i>Benefits common to all options:</i> (a) Benefits in relation to the expanded area of urban residential development, taking into account that it provides: ○ Benefits to future residents from the expanded number of residential properties that could be established under the provisions, in a desirable location, and thereby generates social wellbeing for the residents and wider community; ○ Benefits from the increased employment arising from the subdivision works and from future construction works on the new residential sites created, and the contribution that new households will make to the local and district economy; ○ Additional supply and competition in the residential land market; ○ Benefits in the certainty of identifying an ONL boundary which is otherwise not identified. (b) National Planning Standards are intended to implement consistent zoning. While the Request is not giving effect to the Planning Standards, applying a residential zoning consistent with those existing in the PDP is likely to provide for a more efficient transition when adoption of the Planning Standard is undertaken in the future (Note this benefit does not apply to Option 4).			
Ranking	4	3	1	2

3.2 Conclusion

The preferable option is therefore Option 3, to rezone to a mix of existing PDP zones with additional location-specific provisions, including mechanisms such as a Structure Plan, as needed. This approach focuses on integrating the existing NSZ provisions into the PDP principally through already tested methods of the PDP and aligns with the key principle of the District Plan review to date of establishing a consistent and concise approach to resource management in the district through all new provisions of the PDP.

Option 3 is therefore evaluated in more detail below.

4. Sections 32(1)(b) and 32(1)(c): examining the provisions of the proposal in achieving the objectives

4.1 Provisions of the proposal

The provisions of the proposal are set out in the tracked change versions of Chapters 27 (Subdivision and Development) and 11 (Large Lot Residential Zone) in [DOCUMENT 2](#). The Request proposes to establish existing PDP zones over the Site, with the following location-specific provisions to apply to the area of residential infill development in the northwestern part of the Site. In summary the location-specific provisions are:

(a) In Chapter 27 – Subdivision and development:

- (i) Inclusion of the Northlake Structure Plan, identifying areas of Native Grey Shrubland, Landscape Bunding, and indicative locations of walkway and cycle trails;
- (ii) New location-specific objective and four policies in Chapter 27 that require subdivision and development to be consistent with the Structure Plan while requiring landscape bunding and planting to protect the landscape values of the Dublin Bay ONL and enhance biodiversity and amenity values in a manner that integrates with and complements existing development;
- (iii) Inclusion of rules providing for subdivision within the Structure Plan area as a Restricted Discretionary Activity, with information requirements relating to the required Structure Plan elements (Native Grey Shrubland, Landscape Bunding, and Walkway / Cycle links); urban design and ecological values, with subdivision applications that do not include this information, as well as subdivisions not consistent with the Northlake Structure Plan, defaulting to a Non-Complying status;

(b) In Chapter 11 – Large Lot Large Lot Residential A Zone

- (i). Amendment to Policy 11.2.1.6 relating to managing the colour and reflectivity of buildings in order to ensure that development is visually recessive and well-integrated in the landscape to include reference to the Northlake Structure Plan area;
- (ii). Amendments to the development standards of the Zone that apply within the Structure Plan area, including a minimum lot size of 1200m², a maximum height of 5.5m, a maximum building area of 500m² per site, 4.5m road boundary setback and the application of specified building materials and colours;

(c) In the PDP **planning maps**:

- (i). Introduction of PDP zones to replace the current ODP Zones, as discussed above; and
- (ii). Inclusion of the ONL classification on Lot 2000 DP 628020.

No changes to the following PDP Strategic and District Wide chapters are necessary. The provisions of these chapters are settled and the application of these provisions are the most effective, efficient, and appropriate way to manage the subject matter for the Site in conjunction with its new standardised zoning.

Strategic Chapters: Chapter 2 (Definitions), Chapter 3 (Strategic Direction), Chapter 4 (Urban Development), Chapter 5 (Tangata Whenua), and Chapter 6 (Landscapes – Rural Character).

District Wide Chapters: Chapter 26 (Historic Heritage), Chapter 28 (Natural Hazards), Chapter 30 (Energy and Utilities), Chapter 32 (Protected Trees), Chapter 33 (Indigenous Vegetation and Biodiversity), Chapter 34 (Wilding Exotic Trees), Chapter 37 (Designations), Chapter 38 (Open Space and Recreation Zones), and Chapter 39 (Wāhi Tūpuna).

4.2 Evaluation

The duty under s32(1)(b) is to examine whether the provisions of the proposal are the most appropriate way to achieve the objective, by identifying other reasonably practicable options for achieving the objective and assessing the efficiency and effectiveness of the provisions in achieving the objective.

Under s32(1)(c), the costs and benefits of the environmental, economic, social and cultural effects anticipated from implementation of the provisions must be identified and assessed.

Table 2 below sets out the evaluation required under section 32(1)(b) (appropriateness, efficiency and effectiveness of the provisions for achieving the objective, and identifying other reasonably practicable options for achieving the objective); and the evaluation required under section 32(2)(a) (costs and benefits of the provisions).

Table 2: Evaluation of provisions (s32(1)(b) and s32(1)(c))

Plan Provisions		
- Northlake Structure Plan 27.13.X - Objective 27.3.3X - Policies 27.3.3X.1 – 27.3.3X.4 - Rules 27.7.33B.1 - 27.7.33B.3		
Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
(a) The combination of zoning, Structure Plan and associated rules limit the development capability of the land to 1600 homes, and this could be seen as an inefficient use of the land resource within the UGB. (b) Costs of the physical works (planting and landscape bunding and walkway / cycle links) required.	(a) The Structure Plan will enable appropriate development, from a landscape and amenity perspective. (b) The rules promote indigenous vegetation, public trails and open space, and thereby enable more public use of the land. (c) The provisions prioritise the planting and maintenance of vegetation to the overall amenity of the area and will assist in absorbing the SRZ and LLRAZ development into the landscape, when viewed from the key public viewpoints. (d) The provision of public walkways and cycleway trails will expand the Upper Clutha trail network and encourage easier access to areas for the public and integrate with the existing trails and adjoining ONL.	The purpose of the SRZ and the LLRAZ (being those zones for development within the Structure Plan area) is to provide for a low density residential activity, in an integrated manner which recognises the constraints from landscape and topography and enables a defensible urban boundary. The policies and methods, including the Structure Plan, are effective and efficient taking into account the components of the Structure Plan including the integration of Native Grey Shrubland planting, and the integration of the land with adjoining trails through new connective links. The rules are effective in that the non-complying status will discourage any proposals for development inconsistent with the Structure Plan, or applications that do not contain the necessary information on the planting, landscape bunding or legal mechanism for design controls. Site-specific provisions in Chapter 27, including structure plans, are a common tool for managing effects and directing certain outcomes where the specific attributes of a site or zone require it. Chapter 27 currently contains numerous structure plans, ranging from entire zones (such as Jacks Point or Millbrook) to smaller scale areas involving only a few lots (such as the Criffel Station rural lifestyle area). The Chapter 11 LLRAZ and Chapter 27 Northlake Structure Plan combination for this part of the Site would be consistent with the PDP's architecture. Of note in particular is the recent Sticky Forest zonings which are a combination of: the SRZ and the LLRAZ (both with site specific land use provisions); the Rural Zone; the ONL; and a Chapter 27 structure plan and related bespoke

		provisions. The framework of rules proposed, with information requirements as part of any application, is based on the Council's style that has been used in other zones, for example in the Jacks Point Special Zone and the Hogans Gully Resort Zone, where specific landscaping or biodiversity areas are required to be established. The proposed Structure Plan and associated provisions ensure that an integrated development, with due regard for wider landscape values, is achieved, allowing the effects on the environment to be thoroughly understood and assessed. Alternative zoning options for the land within the Structure Plan area subject to Native Grey Shrubland plantings was considered, including the Rural Zone and an Open Space zone. The Rural Zone was discounted as it would not be consistent with the higher-order direction to avoid Rural zoned land within the UGB, the location of which within the Site has already been established through Stage 1 of the PDP review. An Open Space Zone was also discounted, except where appropriate for the proposed recreational trails, due to the potential for development that would be inconsistent with the intended outcomes for the land. For example, an Open Space zone could potentially provide for permitted or controlled activities such as buildings, carparking and vehicle access associated with activities permitted within the zone. Other reasonably practicable options for achieving an integrated development included built development in the parts of the land that are more sensitive to landscape change because of their greater levels of visibility from a wider area. However, these were discounted as they would not be consistent with the higher order direction.
Plan Provisions		
• Northlake Structure Plan 27.13.X • Amendments to the development standards of the LLRAZ that apply within the Structure Plan area, including a minimum lot size of 1200m², a maximum height of 5.5m, a maximum building area of 500m² per site, a 4.5m road boundary setback and the application of specified building materials and colours; and • Amendment to Policy 11.2.1.6 relating to managing the colour and reflectivity of buildings in order to ensure that development is visually recessive and well-integrated in the landscape to include reference to the Northlake Structure Plan area.		

Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
(a) The restrictions and controls in place for bulk and appearance of buildings will incur a transaction cost for consenting where these controls are not met. (b) The provisions limit the development capability of the land, and this could be seen as an inefficient use of the of the land resource within the UGB.	(a) The provisions will ensure that a sense of place is created and amenity values are maintained, by ensuring that buildings complement the surrounding landscape.	The combination of rules managing building bulk and appearance (height, coverage and external materials) will be effective in ensuring that development complements the surrounding landscape amenity. Any breaches to specific standards for building bulk or appearance would require, at a minimum, restricted discretionary activity consent, to allow the Council a greater level of control. The alternative of requiring resource consent for all buildings (such as via a controlled or restricted discretionary activity) is less efficient in that it increases transaction costs while achieving the same or similar outcome. The method proposed by the Chapter 11 rules in combination with the Northlake Structure Plan and related provisions is the most appropriate way to achieve policies and objectives because there will be a high degree of certainty about the outcomes promoted by the provisions.
Plan Provisions		
Existing PDP District-Wide and Zone provisions		
Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
(a) The restrictions and controls in place within the various chapters will incur a transaction cost for consenting in the event these controls are not met. (b) The provisions limit the development capability of the land, and this could be seen as an inefficient use of the of the land resource within the UGB.	(a) The existing provisions will retain the ability to appropriately manage relevant effects and achieve the intended planning outcomes through the existing PDP framework.	The provisions of the remaining chapters are settled via the Schedule 1 process undertaken during the PDP review and their utilisation promotes consistency in the application of the PDP and avoids unnecessary changes. The application of these provisions is the most effective, efficient, and appropriate way to manage the Site in conjunction with its new standardised zoning

5. The risk of acting or not acting

Section 32(2)(c) requires an evaluation of the risk of acting and risk of not acting if there is uncertain or insufficient information about the subject matter of these provisions. In this case it is considered that no such uncertainty or insufficiency exists to the extent that a private plan change should not progress. However, for completeness these are addressed as follows.

Risk of acting

There is a risk that the potable water supply network upgrades (identified in section 3.3 of **DOCUMENT 9**) required to service the infill residential development in the northwestern part of the Site may not be confirmed as feasible by QLDC's Property and Infrastructure Department, although given the nature of the upgrades this risk is low.

There is a risk that legislation changes at the central government level may result in a change to the planning regime that applies to the wider District and the ongoing applicability / longevity of the provisions proposed in this Request, however this is a risk on NIL (being the promulgator and cost-bearer of the Request) and not one that affects the Council or community at large.

Risk of not acting

The risk of not acting is the likely significant delay, uncertainty and potential lost opportunity for appropriate infill residential capacity in the northwestern part of the Site, as well as the lost potential benefits arising from that (including increased supply of land for housing; increased biodiversity values through indigenous vegetation planting; and improved recreational trail connectivity and access) and the efficiency and effectiveness of the proposed provisions, as discussed in Part 4 above, would be foreclosed.

6. Section 32(3): Evaluation of the provisions under the relevant District Plan objectives

For the purposes of section 32(3) the proposal is an amending proposal because it will amend the PDP's Chapter 11 and Chapter 27. Where a proposal will amend a plan that already exists, the examination under section 32(1)(b) must relate to the provisions of the proposal and the existing PDP objectives to the extent that those objectives are relevant and would remain if the amending proposal were to take effect.

The examination must therefore address how the provisions of the proposal achieve the PDP's relevant objectives. The PDP sets out the Strategic Direction for the District through Chapters 3 through 6. These provisions are then expanded on through objectives in the remaining chapters of the PDP.

The relevant objectives are those in:

- Chapter 3 (Strategic Direction);
- Chapter 4 (Urban Development);
- Chapter 5 (Tangata Whenua);
- Chapter 6 (Landscapes and Rural Character);
- Chapter 7 (Suburban Residential);

- Chapter 8 (Medium Density Residential);
- Chapter 11 (Large Lot Residential);
- Chapter 15 (Local Shopping Centre);
- Chapter 27 (Subdivision and Development); and
- Chapter 38 (Open Space and Recreation).

The relevant objectives (and policies, in the case of the strategic Chapters 3 through 6) are addressed in detail in [Table 1](#) in [Appendix B](#). In summary, the Request promotes urban development in an appropriate location and contributes to the strategic and integrated management of urban growth. The infill residential development integrates with the existing Northlake development, with shared roading and servicing, open space connections, and connections with adjacent land, will be integrated with existing infrastructure, and can achieve a built environment that provides desirable, healthy and safe places to live, work and play. The Request also protects the wider values of the Dublin Bay ONL through delineation of the ONL boundary and contains the visual effects of urban development when viewed from key public viewpoints.

Overall, the Request is consistent with, and gives effect to, the relevant PDP provisions.

7. Evaluation of the provisions under the relevant regional planning instruments

7.1 Regional Policy Statement

The District Plan must give effect to the operative Otago Regional Policy Statement and have regard to any Proposed Regional Policy Statements. The relevant provisions of the operative Regional Policy Statement²⁰ (**RPS21**) is assessed in detail in [Table 2](#) in [Appendix B](#).

The key relevant provisions relate to: Integrated Management; Freshwater; Land and Soil; Ecosystems and Indigenous Biodiversity; and Urban Form and Development.

The Request will integrate the whole Site into the PDP to enable a consistent and best planning practice approach to development, while the residential infill area in the northwest part of the Site will integrate with the adjacent existing urban development while sustaining the life-supporting capacity of freshwater. The Request will not adversely affect the productive potential of the soils as these have already been impacted by previous development of the NSZ, however the protection, maintenance and enhancement of Native Grey Shrubland areas will have positive effects on indigenous biodiversity values and may have a consequential effect on soil quality over time. The Request improves housing supply while contributing to the maintenance of a well-functioning urban environment.

Accordingly, the Request is consistent with, and gives effect to, the relevant RPS21 provisions.

7.2 Regional Plans

A District Plan must not be inconsistent with a Regional Plan. There is one relevant regional plan: the **Regional Plan: Water**. The Regional Plan: Water addresses the use, development and protection of the freshwater resources of the Otago region, the beds and margins of water

²⁰

Which became fully operative on 9 July 2026.

bodies, and the use, development and protection of those water resources. It provides objectives, policies, rules and implementation to address the use and management of the water resources.

To the extent that this regional plan is relevant, the Request is not inconsistent with them because the amended provisions of the PDP will continue to give effect to the regional plans.

7.3 Iwi Management Plans

Section 74(2A) of the Act requires Council to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

The following iwi management plans are relevant to the Request: *The Cry of the People, Te Tangi a Tauria: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 (MNRMP 2008)*, and *Kāi Tahu ki Otago Natural Resource Management Plan 2005 (KTKO NRMP 2005)*.

MNRMP 2008

The relevant policies of MNRMP 2008 generally have a broader application than a District Plan or the PDP specifically, but overall seek to address iwi involvement in planning processing and plan development, particularly where there may be significant effects, long-term planning implications or cumulative effects.

The key relevant provisions relate to Takitimu Me Ona Uri: High Country and Foothills, and Water Quality (as set out under Te Rā a Takitimu Southland Plains).

The most relevant provisions are assessed in detail in [Table 3](#) in [Appendix B](#). In summary, the Request includes Rūnaka engagement, both prior to lodgement and during the Schedule 1 process. The Request provides for appropriate servicing of urban development by reticulated infrastructure and improvements to biodiversity values by planting of indigenous vegetation.

Overall, the Request is consistent with the MNRMP 2008.

KTKO NRMP 2005

As with MNRMP 2008, the KTKO NRMP 2005 provisions also have broad application. Part 10: Clutha/Mata-au Catchments Te Riu o Mata-au outlines the issues and policies for the Clutha/Mata-au Catchments. Included in this chapter is a description of some of the Kāi Tahu ki Otago values associated with the Clutha/Mata-au Catchments. Generic issues, objectives and policies for all catchments across the Otago Region are included in Chapter 5 Otago Region

The most relevant provisions are assessed in detail in [Table 3](#) in [Appendix B](#). In summary, the Request provides for sustainable land use via efficient urban development, serviced by the existing reticulated networks with no direct discharge to water as a result.

Overall, the Request is consistent with the KTKO NRMP 2005.

8. Evaluation of the provisions under the relevant national planning instruments

8.1 Introduction

National Policy Statements (**NPSs**) provide objectives and policies for matters of national significance. All subsequent Resource Management documents, including regional policy statements, regional plans and district plans must give effect to (implement) any relevant NPSs.

The following NPSs have no applicability to this requested Change:

- The *New Zealand Coastal Policy Statement*
- The *National Policy Statement for Renewable Electricity Generation*
- The *National Policy Statement for Electricity Networks*
- The *National Policy Statement for greenhouse gas emissions from industrial process heat*
- The *National Policy Statement for Highly Productive Land*

The relevant NPSs are addressed below.

8.2 Assessment under the *National Policy Statement on Urban Development 2020*

The *National Policy Statement on Urban Development 2020 (NPS-UD)* is relevant to this Request. It came into effect in August 2020, at which time it replaced the previous National Policy Statement on Urban Development Capacity 2016.

The NPS-UD requires all councils that have all or part of an urban environment within their district or region to plan well for growth and ensure a well-functioning urban environment for all people, communities, and future generations. This includes:

- Ensuring that plans make room for growth both ‘up’ and ‘out’, and that rules are not unnecessarily constraining growth;
- Developing, monitoring and maintaining an evidence base about demand, supply and prices for housing and land to inform planning decisions; and
- Aligning and coordinating planning across urban areas.

The NPS-UD is a directive document. It includes objectives and policies that councils must give effect to in their resource management decisions. The NPS-UD is relevant to the extent that Queenstown-Lakes is a “tier-2 authority” and has various obligations for improving housing affordability and supporting competitive land and development markets. The NPS-UD requires every tier 1 and tier 2 local authority to prepare a Housing and Business Development Capacity Assessment (**HBA**) every three years to provide information on the demand and supply of housing and business land in the urban environment to inform planning documents under the Act and to quantify the development capacity sufficient to meet demand in the short, medium and long term.

The most recent Queenstown Lakes District Housing and Business Development Capacity Assessment was completed in 2025 (the **HBA2025**) and identifies that the Wānaka Ward is projected to absorb a much larger proportion of future district growth than historically, expecting to attract approximately 45% of all additional dwelling demand across the district over the next

30 years²¹. This results in a projected demand of an additional 12,200 dwellings in the Wānaka Ward by 2053²².

The HBA2025 included the NSZ in its capacity modelling assumptions, using its existing bespoke density provisions for the residential capacity modelling²³. It also included the notified UIV provisions for its medium and long term capacity modelling, although these have since been amended through the hearings and decision process and may yet be further amended through the appeals process.

The objectives and policies of the NPS-UD are assessed in detail in [Table 4](#) in [Appendix B](#). In summary, the Request will contribute (through infill residential development in the northern part of the Site) to more land for residential development in a well-functioning urban environment to better provide for the District's future social, economic and cultural wellbeing. With respect to Policy 5 of the NPS-UD, consideration has been given to whether, when applying standardised PDP zones, the Site's (or parts of the Site) level of accessibility or the relative demand for housing justifies an increase in height and density of urban form beyond that already achieved through the amendments to zone provisions via the UIV.

In particular, consideration was given to whether the existing Activity Area A of the NSZ (located in the southern part of the Site adjacent to Aubrey Road) should be rezoned to a higher-density residential zone. However, given the absence of existing or planned public transport in Wānaka, together with the Site's distance from both the Town Centre and the Three Parks commercial centre, the Site does not meet the criteria for further upzoning under Policy 5(a). Instead, a very low density residential zoning was preferred to maintain a graduation between adjacent rural / rural living / large lot zoning and development and more intensive town centres or higher density areas.

Overall, the Request is consistent with the NPS-UD.

8.3 Assessment under the *National Policy Statement for Indigenous Biodiversity*

The *National Policy Statement on Indigenous Biodiversity (NPS-IB)* is relevant to this Request. It came into effect in August 2023. As the site is not within an identified Significant Natural Area (SNA), the relevant provisions are those relating to indigenous biodiversity outside of SNAs.

The objective of the NPS-IB is to maintain indigenous biodiversity nationally so that there is at least no overall loss in indigenous biodiversity. The objective and policies are addressed in detail in [Table 5](#) in [Appendix B](#). Clause 3.16 of the NPS-IB further sets out how indigenous vegetation outside SNAs is to be managed and requires that the effects management hierarchy must be applied to manage any significant adverse effects of new subdivision, use or development on indigenous biodiversity. All other adverse effects must be managed to give effect to the objectives and policies of the NPS-IB.

As set out in [DOCUMENT 7](#), the Request is consistent with maintaining indigenous biodiversity as it will have no overall reduction in the size and occupancy of indigenous species, and it will result in a net gain in biodiversity values. It will also have the effect of improving the connectivity between and resilience of indigenous biodiversity due to the size and location of the required Native Grey Shrubland planting areas.

²¹ [Queenstown Lakes District Housing and Business Development Capacity Assessment 2025](#), pages 3 and 67
²² *Ibid*, page 77
²³ *Ibid*, page 192

The proposed Native Grey Shrubland planting areas as shown on the Structure Plan and the associated provisions in Chapter 27 will support an increase in indigenous biodiversity, particularly those associated with grey shrubland, on the site as a direct result of the Request.

To the extent that this statement is relevant, the requested Change is consistent with it.

8.4 Assessment under the *National Policy Statement for Infrastructure*

The *National Policy Statement for Infrastructure (NPS-I)* is somewhat relevant to this Request, in that infrastructure upgrades (to stormwater, wastewater and potable water networks) will be needed to support the infill residential development (see [DOCUMENT 3](#) and [DOCUMENT 9](#)). It came into effect in January 2026. The single objective of the NPS-I is:

The objective of this National Policy Statement is to:

- a. ensure the national, regional and local benefits of infrastructure are provided for;***
- b. enable infrastructure to support the social, economic and cultural wellbeing of people and communities and their health and safety;***
- c. enable infrastructure to support the development and change of urban and rural environments to meet the diverse and changing needs of present and future generations;***
- d. ensure infrastructure is well-functioning, resilient and compatible, as far as practicable, with other activities; and***
- e. ensure infrastructure is delivered in a timely and efficient manner while managing adverse effects from or on infrastructure.***

Overall, the Request achieves the objective in that infrastructure upgrades will support the development and change (through infill) of the existing urban environment of Northlake in order to meet the needs of present and future generations for housing in the Upper Clutha. In doing so, it will support the social and economic wellbeing of people and their communities, including their health and safety, which is improved through increased provision for housing opportunities. There will no adverse effects arising from the infrastructure upgrades included as part of the Request (as set out in [DOCUMENT 3](#) and [DOCUMENT 9](#)), and no adverse effects on national or regionally significant infrastructure will arise from the Request.

8.5 Assessment under the *National Policy Statement for Natural Hazards*

The *National Policy Statement for Natural Hazards (NPS-NH)* is relevant to this Request in that it applies to all activities managed under the Act. It came into effect in January 2026. The single objective of the NPS-NH is:

Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.

The relevant policies in this instance require the use of the NPS-NH risk matrix when considering natural hazard risk associated with subdivision, use or development (Policy 1) and for natural hazard risk to be managed using an approach proportionate to the level of risk (Policy 2).

The natural hazard risk arising from the Request was assessed in [DOCUMENT 10](#) using the NPS-NH risk matrix, and found to be low. The recommended measures to mitigate the low risk (adherence to structural and building codes) are a proportionate approach to the risk.

The Request therefore achieves the objective of the NPS-NH.

8.6 Assessment under the *National Policy Statement for Freshwater Management*

The *National Policy Statement for Freshwater Management (NPS-FM)* has a limited applicability to this Request, in that infrastructure upgrades to the existing stormwater network will be needed to support the infill residential development. It came into effect in September 2020, at which time it replaced the previous National Policy Statement on Freshwater Management 2014. The single objective of the NPS-FM is:

The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

- a. first, the health and well-being of water bodies and freshwater ecosystems***
- b. second, the health needs of people (such as drinking water)***
- c. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.***

The stormwater from the infill residential development will be managed onsite as discussed in [DOCUMENT 9](#), and in accordance with all existing rules and codes of practice, and therefore there will be no adverse effects on the health and well-being of freshwater bodies in the Clutha River Mata-au Freshwater Management Unit.

8.7 Consistency with the *National Planning Standards*

In April 2019 the Government released a set of National Planning Standards (**Planning Standards**) that require all regional policy statements, regional plans and district plans to have a nationally consistent structure and format. The Planning Standards also prescribe certain definitions, noise and vibration metrics, and requirements for electronic functionality and accessibility. The Planning Standards have been introduced to improve the efficiency and effectiveness of the planning system, rather than seeking to alter the outcomes of policy statements or plans.

The Planning Standards have not yet been incorporated into the PDP to date as it is understood that these will be incorporated through a review at a later date to ensure plan wide consistency of terminology. The Request is therefore consistent with the existing PDP.

9. Summary and conclusions

The above evaluation has examined the Request under section 32 of the Act. The broad conclusions from that evaluation are that:

- (a) Under section 32(1)(a), the objectives of the Request are necessary and are the most appropriate way to achieve the purpose of the Act, taking into account the existing higher order provisions of the Proposed District Plan and the relevant provisions of the regional and national planning instruments;
- (b) The provisions are the most appropriate way to achieve the objectives, taking into account the expert reports;
- (c) The provisions will be efficient and effective in achieving the objectives, taking into account their costs and benefits including the environmental, social and economic costs and benefits;
- (d) The risks of not acting are significant to NIL, and to a lesser extent, and the wider community and outweigh any risks of acting.

Overall, for the reasons expressed above, and in the supporting reports including the assessment of effects on the environment, the Request will achieve the higher order objectives of the Proposed District Plan and the purpose and principles of the Act.

Appendix A: QLDC Monitoring Report

S35 Monitoring Report Northlake Special Zone

2025

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Executive Summary

This report assesses the efficiency and effectiveness of the objectives, policies and rules of the Northlake Special Zone in the Queenstown Lakes Operative District Plan (ODP) in accordance with s35(b) of the Resource Management Act 1991 (RMA). The findings of this report will inform amendments to the Northlake Special Zone as part of the review of the special zones of the ODP. The findings are based on available building consent and resource consents that have been lodged within the Zone as well as officer research.

The analysis shows most provisions are effective in delivering the desired outcomes. Use of the Structure Plan to guide development alongside the underlying Outline Development Plans have by and large effectively provided for Northlake to develop as anticipated. Provisions related to landscape, amenity, ecology, open space and recreation, infrastructure and efficient land use have broadly been adhered to. A few key issues were identified:

- The sequencing of community facilities alongside the stages of development.
- The stormwater challenges in the zone

For residential-scale development (i.e. resource consents for individual houses), breaches noted relate to site density, maximum heights, minimum lot sizes, and maximum building site coverage.

Over the last few years, planning changes sought outside the zone framework through fast track consenting and a private plan change signal the zone may not always be working over time.

Despite these breaches, overall it is found that the objectives and policies for the Zone have been mostly effective and generally resulted in the outcomes anticipated by the district plan.

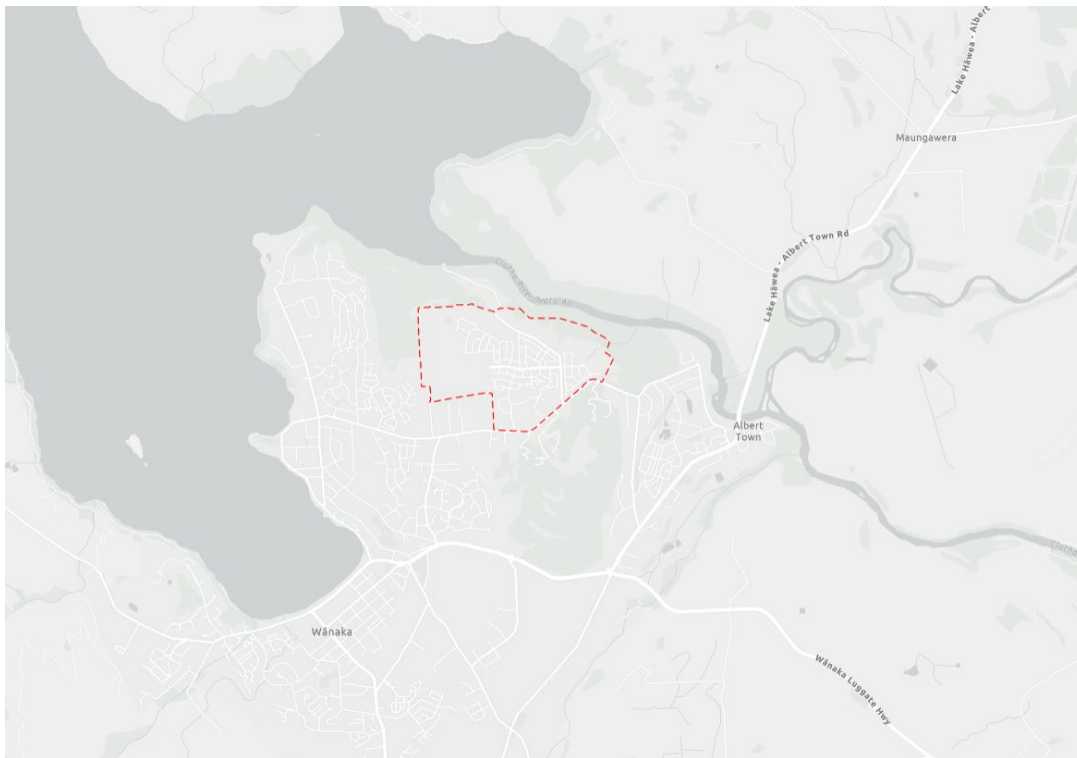


Figure 1 Northlake Zone, Wānaka

Introduction

This report monitors the effectiveness and efficiency of the Northlake Special Zone (the Zone) in the Operative District Plan (ODP). The focus of this report is to determine whether the ODP provisions for the Zone are efficient and effective, whether the objectives and policies are being achieved, and to help identify any emerging resource management issues. The findings of this report will help to inform the review of the Northlake Special Zone, and the wider review of the special zones of the ODP. This report fulfils the requirements of section 35(b) in relation to the Northlake Special Zone

The RMA requires the effectiveness and efficiency of a plan are assessed, with the findings then used to inform the review of a plan. This is focused on the efficiency and effectiveness of the plans objectives, policies or methods (i.e., rules).

District plan effectiveness monitoring requires the Council to compare what is actually occurring under the district plan provisions with the intentions of the plan (as expressed through its objectives). This involves first identifying what the plan is trying to achieve for the zone, and to then track how well it is achieving these objectives. Once an understanding of how well the objectives are being met, the next consideration is identify to what extent this can be attributed to the District Plan policies and rules and to what extent 'outside' influences may be affecting the ability of the Plan to achieve its objectives.

Plan efficiency monitoring refers to comparing the costs of administering the plans provisions incurred by applicants, the Council and other parties compared to the outcomes or benefits achieved. It is noted here that determining what level of costs are acceptable is generally a subjective judgement and, as such, it is difficult to reach definitive conclusions. It is also considered that if development can be undertaken with no resource consent fees then that improves the efficiency of the Plan.

Requirements of the Resource Management Act (1991)

Section 35 of the Resource Management Act 1991 (RMA) states that:

(2) Every local authority shall monitor –

...

(b) the efficiency and effectiveness of policies, rules or other methods in its policy statement or plan;

...

and take appropriate action (having regard to the methods available to it under this Act) where this is shown to be necessary.

What is the Northlake Special Zone?

Site description and context

Northlake is a rapidly developing urban area near the northern edge of Wānaka. It is becoming an integral part of Wānaka's urban fabric, providing a range of living choices and acting as a northern urban hub between the areas of Albert Town and Wānaka. Aubrey Road provides the main connection to Northlake while a series of pedestrian and cycle trails provide active travel connections to wider Wānaka.

Northlake exists atop a landform of alluvial terraces and hummocky hills. The land to the north of Northlake descends across a series of vegetated terraces to meet the Clutha River/Mata-au Outlet. The northern edge of the zone sits within an Outstanding Natural Landscape / Feature and is immediately adjacent to the Dublin Bay Priority Area Landscape Schedule (21.22.22)¹.

The land to the east is occupied by the Hikuwai Reserve, which is a flat landform clad in mature kanuka shrubland and managed by the Department of Conservation.

The land to the south is zoned Large Lot Residential and is part of an urban character area abutting the foot of Mount Iron and Little Mount Iron.

The land to the west is Hāwea/Wānaka-Sticky Forest is land being held by the Crown under the Ngāi Tahu Claims Settlement Act 1998 for beneficiaries of the South Island Landless Natives Act (SILNA) to be identified by the Māori Land Court. It is anticipated the land will be a residential development in the future, currently it is clad in mature conifers and used for informal mountain biking and walking.



¹ The general description is: *The Dublin Bay PA encompasses the ONL of the Dublin Bay foreshore and flats on Lake Wānaka and extends to the crests of the landforms enclosing the bay and the Clutha Mata-au outlet – Mount Brown, the glacial moraine behind the bay, the headland on the northern side of the outlet, and the landforms enclosing the southern side of the outlet. The PA is a landscape unit within the wider Lake Wānaka ONL and its boundaries form the visual catchment of the lake when viewed from the lake surface.*

A Residential Focused Mixed-Use Zone

The Northlake Special Zone (the Zone) provides for a predominantly residential neighbourhood, with pockets of zoning which allow for commercial / mixed-use. The 2023 census has 1,810 people resident in the census unit which encompasses much of the zone. The area offers a range of housing choices and lot sizes ranging from low to medium density sections, with larger residential sections on the southern and northern edges. The zone enables development of the land resource in a manner which reflects the zone's landscape and amenity values.

The Zone includes a Structure Plan showing the general layout of the zone as well as:

- the primary internal road network,
- external road intersections,
- pedestrian linkages and routes through the zone,
- areas to be protected from any development
- tree protection and building restriction areas and
- the developable areas.

An important component of the Zone is the need to submit an Outline Development Plan as part of an application for consent. They are a high-level master plan template providing a link between the Structure Plan, and the subsequent detailed subdivision and building plans. An Outline Development Plan is described in one resource consent document as an "integral link ensuring an iterative design process, filling the gap between the high level structure plan and subdivision of the zone, in anticipation of multiple landowners/developers over time².

Since its inception the zone has largely been developed in accordance with the Structure Plan and to the densities anticipated and set out in the rules. The densities expected versus realised will be further examined through the zone review. For the present, according to rating data (property descriptions) the following characteristics are present in the zone:

Rating Property Description	Count in the Zone
Commercial Offices	4
Educational	1
Lifestyle-Single unit	1
Multi use within Commercial	2
Residential - Multi Unit	7
Residential -Single Unit	742
Retail - Commercial	20
Vacant Residential	270
Total	1047

Table 1 Rating Data - property description (as at Feb 2025)

² See the AEE for RM160152, page 29

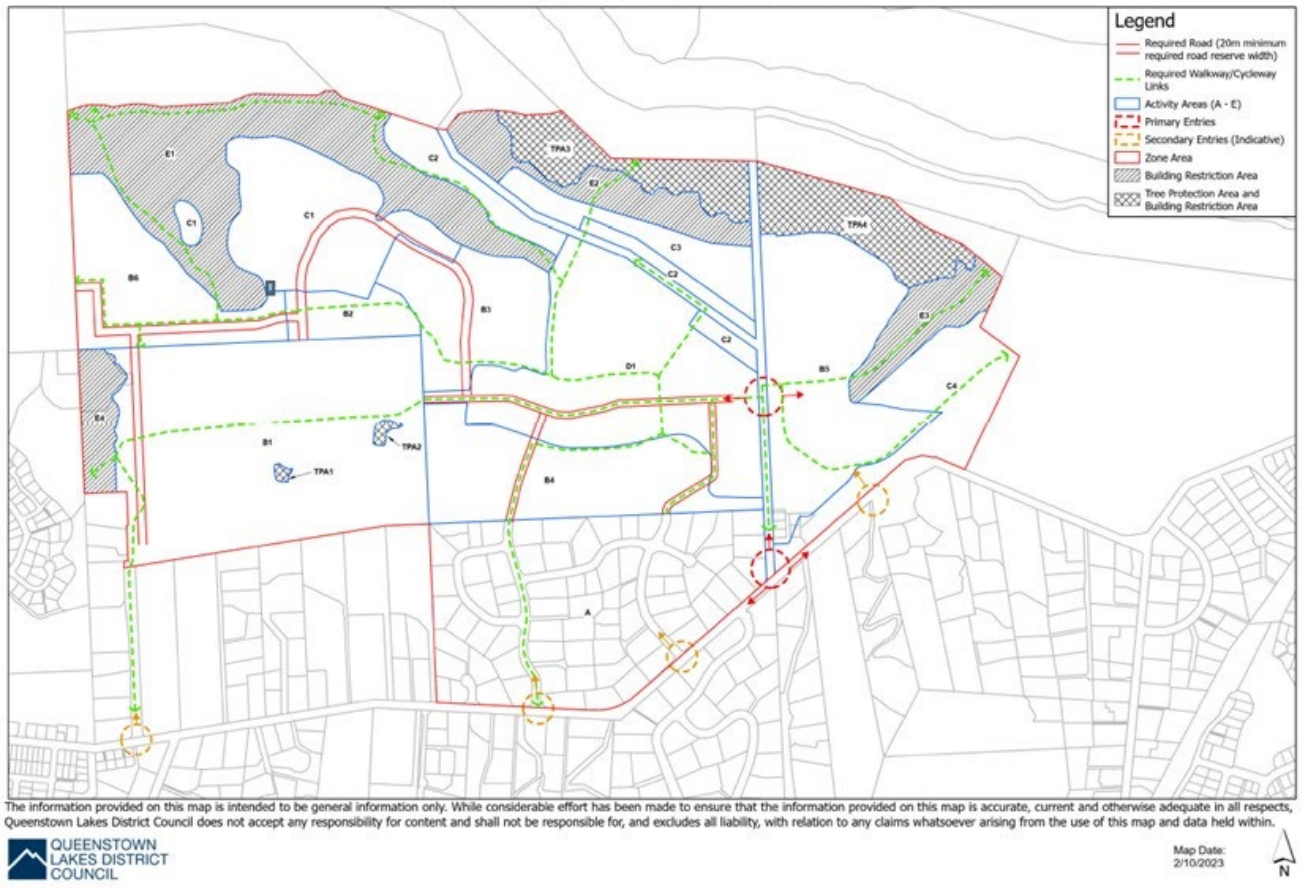


Figure 2 Northlake Structure Plan



Figure 3 Northlake landscape – 2021. Source; Northlake Plan Change Request Northlake Investments Limited Visual Assessment Images 19 January 2022 Reference : PA21628 IS04

How was the Northlake Special Zone Created?

The land was identified in the Wānaka Structure Plan 2007 as being suitable for development due to its proximity to community and education facilities and to future public transport linkages. Following that process (the strategic document was intended to be a guide to future planning across Wānaka), a series of resource consents were issued but never realised in the area for boundary adjustments, amalgamations and smaller subdivisions at densities more similar to lifestyle blocks.

The Zone as known today was processed as a private Plan Change 45 (PC 45) to the Operative District Plan for the Northlake Special Zone between 2013-2015. The Zone was based on a comprehensive landscape-based masterplan which identified opportunities for differing scales and intensities of development of the area. The Zone was initially approximately 220ha and envisaged up to approximately 1,500 residential homes within several different neighbourhoods based upon density and land ownership. It also included a small commercial and community facilities node.

The planning framework proposed for PC 45 was consistent with standard practice at the time within the District, including a structure-plan based Zones in a dedicated chapter 12 of the district plan.

The Northlake Special Zone has gone through a series of smaller scale private plan changes to the policy framework since its initial inception. In 2019 Plan Change 53 was approved, it amended Activity Area D1 (where retirement villages and commercial activities are enabled), and associated rules.

The most recent change to the Northlake Special Zone was Plan Change 54 (2022-2024) which was approved without appeal and made the following changes:

- Amended the Zone's Structure Plan to include a required road to the boundary of Sticky Forest,
- Amended the boundaries of activity areas to enable additional development in the Zone,
- amended Section 15 (Subdivision, Development and Financial Contributions) to specifically address the adequacy of the Zone's stormwater management and
- included a Non Complying activity for any subdivision to Activity Area B6 dependent on the development of legal access.

Current interests and a notable consent

Currently there are understood to be three principal developer interests within the Northlake Special Zone:

- East of Outlet Road – Hikuwai - (Exclusive Developments),
- Northwest of Outlet Road - Northlake (Northlake/Winton)
- Southwest of Outlet Road – Allenby Farm (WFH Properties Ltd)

A notable consent was issued to Winton in 2020 for the Northbrook Wānaka Retirement Village under special legislation, the Covid 19 Recovery Fast track Consenting Act.

What is the Zone trying to achieve?

The Plan identifies six resource management issues:

Landscape and Amenity

High quality amenity outcomes are recognised as important to address landscape and amenity issues identified in the Zone. Identifying the urban edge within the Zone is also raised for its importance to preserve landscape values enjoyed from the Lake Wānaka and Clutha River.

Community

The Zone's provisions enable the development of a commercial precinct to address some of the daily needs of the local community.

Ecology

The impact of pastoral farming is identified as having degraded natural values of the land included within the Zone. To address this the protection of mostly kanuka vegetation and through encouraging tree planting some of these values can be enhanced. Development near the boundary of the Hikuwai Conservation Area is also managed to protect the associated values.

Open Space and Recreation

For open space and recreation, the Chapter recognises the Zone presents 'opportunities to provide open spaces and trails that will contribute to the Wānaka community's social and economic wellbeing'. Continued and increased opportunities to access Lake Wānaka and the Clutha River/Mata-au outlet are identified as potentially being 'secured as part of the development of the land'.

Efficient Land Use

The intent of the Zone is for residentially zoned land to be used efficiently to promote housing affordability and to relieve pressure to develop more sensitive land in and around Wānaka.

Infrastructure

Issues for infrastructure are recognised in the Chapter, development within the Zone requires the provision of services including water supply, sewerage disposal, telecommunications, and electricity supply.

In response to these issues, the efficiency and effectiveness of the objectives and policies are discussed in detail later in this report.

The 'State' of the Special Zone

Methodology

Establishing the current state of the Zone involves two forms of data collection:

- A desktop review of resource and building consent data and,
- physical monitoring of the zone

This approach allows for the analysis of both data sets to obtain a clearer picture of the kind of development activity on different properties in the zone.

Additionally, information on enforcement and infrastructure issues was obtained from different internal teams within council. This information has been included within this report as well.

Council data³

Resource consents

A total of 296 resource consent applications were processed in the Zone over a period of 8 years between 2015 and 2023.

Activity Type	Count of Activity Type	Percentage
Development (New)	184	62%
Subdivision	59	20%
Variation	23	8%
Alteration	9	3%
Outline Plan	8	3%
Visitor Accommodation	6	2%
Land use	5	1%
Total	294	100%

Table 2 Activity type

³ The resource consent activities occurring in the zone has been compiled from Council's TechOne system. In-person monitoring was undertaken by members of the Queenstown Lakes District Council policy planning team. The monitoring involved a walkaround survey noting if a site has been developed and the type of developments that have occurred (residential, commercial or industrial). This data collection was then compared with the resource consent data to detail the differences between the datasets.

This is the period between the establishment of the Special Zone through a private plan change and the start of the review process required by Section 35 of the Resource Management Act. The timeframe for the data begins in 2015 when the first consent was recorded (RM151090) and goes through to October 2023, a period of approximately 8 years.

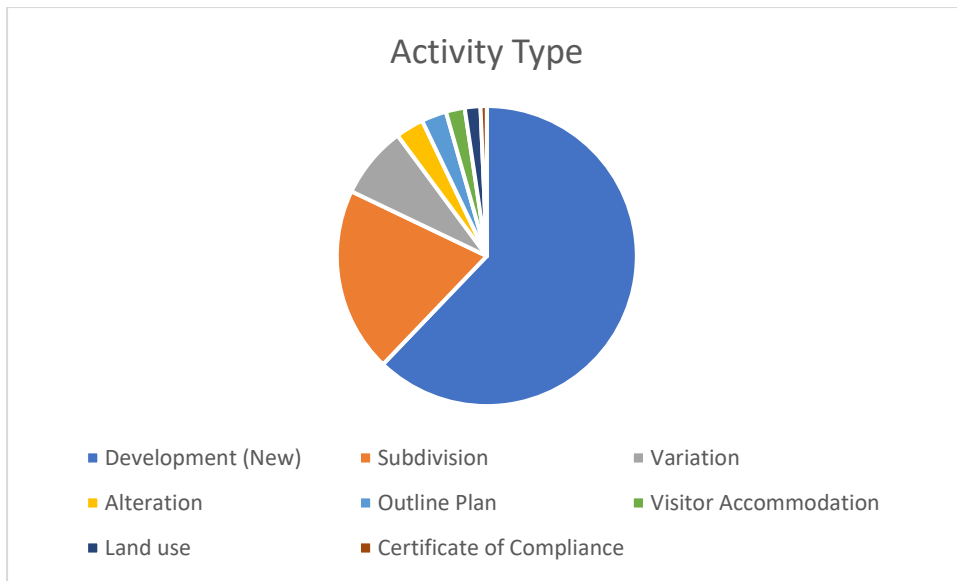


Figure 4 Activity Type

Type of Activity

- 62% of monitored resource consents in the Zone were for new developments, while 20% were undertaken to subdivide existing lots (Table 1).
- The remaining consents monitored were undertaken to make alterations/additions to existing structures, to establish visitor accommodation activities, and various other consent types as seen in the table below.

The strong distribution of consents for new developments and subdivisions is expected due to the recent creation of the Zone. This has led to the development of an urbanised landscape as expected by the policy framework of the zone.

Resource Consent	Count	Percentage
Residential	164	67%
Earthworks	30	12%
Consent variation	25	10%
Accessory Building	15	6%
Visitor Accommodation	6	4%
Commercial	3	1%
Total	243	100%

Table 3 Resource Consents

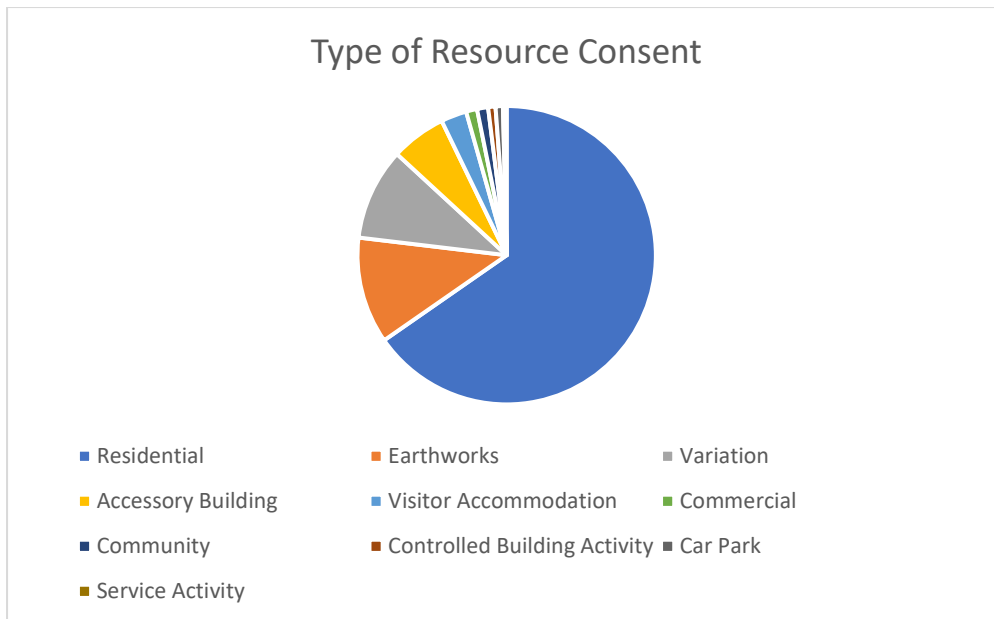


Figure 5 Type of Resource Consent

Resource Consent

Table 2 shows the consented development activity type sought through consenting, key highlights are:

- Sixty five percent of consents were residential. Notably, construction of building in activity areas A, and C1 to C4 is a controlled activity (rule 12.34.2.2).
- The largest consent monitored was undertaken for the creation of 20 units (RM180492) associated subdivision.
- Twelve percent of consents recorded for earthworks activities were undertaken for bulk earthworks, earthworks associated with residential developments and for earthworks associated with subdivision consents. The collected data is reflective of the Zone's residential purpose, with the high proportion of consents for residential activities being in line with Objective 1 and Objective 2 for the Zone.

Consent variations

Variations to previous resource consent conditions, amendments to established structures and the development of accessory buildings on developed lots were also recorded within the Zone. The proportion of consents applied for to make variations to established activities and consents for additional structures on residential lots being lower than those for new developments is not unexpected. The previous tables show that the most common activity recorded within the Zone is for new residential developments which was the expected outcome for the zone and its provisions.

Visitor Accommodation

Six consents were granted for visitor accommodation activities within the zone. The number of days per year in which visitor accommodation activities can take place ranged from 180 (RM200147) up to 365 days (RM190823; RM220217; 221030). Five of the consents for visitor accommodation were undertaken on existing residential units while the remaining consent (RM210138) was for mixed-use activities, including commercial and residential activities and the creation of 31 unit titles through a

subdivision. The Zone provisions include controls on visitor accommodation activities. The Zone currently does not contain any provisions for residential visitor accommodation activities⁴. This is observed in the mixed-use consent (RM210138) where a visitor accommodation activity triggers a restricted discretionary activity in Activity Area D1.

Other activities

Two consents were issued for community activities while another was for the development of a retirement village. The community activities consisted of a mixed-use development which included a health care facility (RM161230) and for the development of an early childcare centre (RM170368).

Community activities are identified as an issue for the Zone in 12.33.1, stating that 'Development in Northlake shall occur in a manner that provides for the integration of activities important for the social wellbeing of the community'. Resource consent for the first three stages of the zone (RM160509) breached policies and rules controlling large-scale developments *prior to* the development of community facilities, showing this particular set of rules and trigger was not effective in terms of the sequencing of development and facilities.

The consent for the retirement village (RM220193) was issued to the developer of Northlake as a fast track consent under special Covid legislation and triggered breaches of standards for earthworks, setbacks for a non-residential activity in the Zone. A condition of the Retirement Village consent was for the developer to lodge a Private Plan Change to provide for a road connection to the adjacent Sticky Forest land, this resulted in PC54 as previously discussed.

Decision Making and Consent Activity Status

The activity status of resource consents can provide useful insight into the effectiveness of a Zone's Objectives and Provisions. A higher percentage of consents being undertaken as non-complying activities indicates a consistent breach to established standards, and the desire for developments which do not conform with the standards.

Activity Status	Count	Percentage
Deemed Permitted	18	7%
Controlled	47	18%
Restricted Discretionary	97	38%
Discretionary	50	19%
Non-Complying	47	18%
Total	259	100%

Table 4 Activity Status

The consents monitored had a variety of activity statuses, the largest proportion were restricted discretionary. 18% of consents were for non-complying activities.

Reasons for Non-Complying Status	Count	Percentage
Subdivision	11	20%
Maximum Building Coverage	7	13%
Maximum Building Height	5	9%
Reflectivity	8	15%
Visitor Accommodation	4	7%
Recession Plane	2	4%
Outline Plan	3	5%
Structure Plan	4	7%
Site Density	1	2%
Roof Pitch	1	2%
Building Restriction Area	3	5%
Non-Residential Activity	3	5%
Minimum Lot Size	1	2%
Noise	1	2%
Tree Protection Area	1	2%

Table 5 Non Complying Resource Consents

As shown in Table 4 above, the reasons for the triggering of non-complying activity statuses were varied. The most common breach was for subdivision activities (20%), in which breaches to standards for the number of lots being created, and the number of affordable dwellings included within the development plans were triggered.

The breaches for affordable housing relate to Rule 15.2.20.1 which establishes the need to build affordable housing within area D1. The Rule requires that “The development of Activity Area D1 shall result in 20 affordable lots”, and that “A legal method must be implemented which will ensure that each of the required 20 affordable lots are delivered to market. That legal method must include a three month option in favour of the Queenstown Lakes Community Housing Trust (QLCHT) whereby the Trust may purchase the lot or nominate the purchaser of the lot”⁵.

⁵ Operative District Plan 15.2.20.1

In 2023 the QLCHT established affordable housing in the zone⁶ as a result of these rules alongside a private developer agreement which was promulgated at the formation of the zone. Breaches were related to development-specific needs at the time of consent, showing that the rules were mostly effective at delivering the affordable housing outcomes sought.

Breaches were also recorded for building form, with breaches to site density, maximum heights, minimum lot sizes, and maximum building site coverages all recorded.

Notification Process	Count	Percentage
Non-Notified	277	94%
Limited Notified	0	0%
Publicly Notified	19	6%

Table 6 Notification Status

Table 5 shows that the vast majority of consents were processed on a non-notified basis (94%), meaning that either affected party written approvals were supplied where the effects were minor or that the effects were deemed to be less than minor. The 19 publicly notified consents were undertaken for larger scale developments with both subdivision and residential activities.

Building Consents

Like resource consent data, the building consent activities occurring in the zone have been compiled from Council's TechOne system. The data only includes applications for building consents issued between 2015 and 2023. Key highlights are:

- A total of 449 building consents have been issued since 2018.
- The majority were for new or relocated residential dwellings (86%) and is consistent with Resource Consents Data

Building Consent	Count	Percentage
Alteration to Dwelling	10	2%
Commercial	9	2%
Multi-Unit Dwelling	27	6%
New or relocated Residential Dwelling	387	86%
Total	433	96%

Table 7 Building Consents (Purpose)

In-Person Survey

⁶ [Northlake - Queenstown Lakes Community Housing Trust](#)

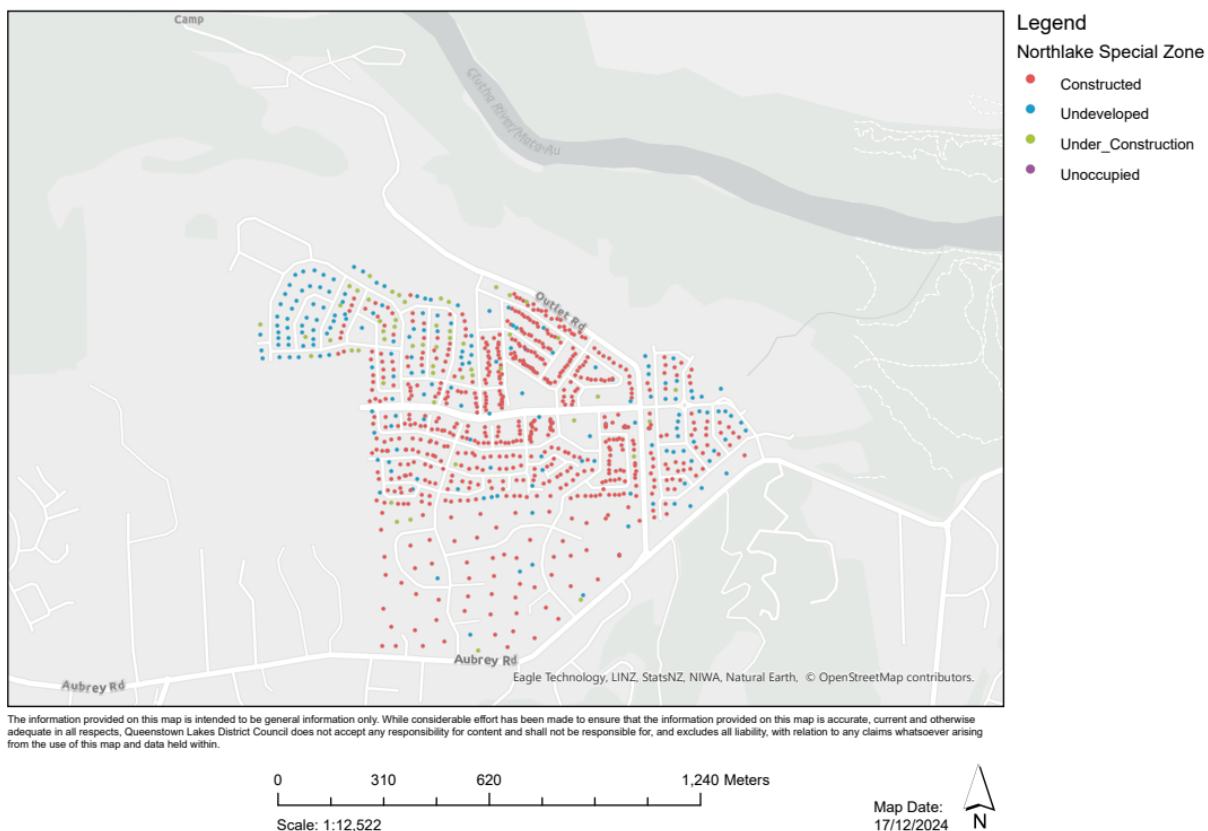
An in-person survey was completed in October 2023 to validate the outcomes of the monitored resource and building consents data. The in-person survey data sought to capture information on subdivision and activities taking place in the zone. This data is then compared with the consenting data to provide further insight into the efficiency and effectiveness of the zone.

State of Site	Count	Percentage
Constructed	626	74%
Undeveloped	172	20%
Under Construction	52	6%
Total	850	99%

Table 8 State of Lots

The number of lots within the Northlake Special Zone was 851. 74% of lots have been developed. The remaining lots were undeveloped (20%) and under construction (6%). As seen in Figure 5 there is a concentration of undeveloped lots at the north-western and eastern fringes of the Zone. This falls in line with the staged approach of development of the Zone and as such is to be expected.

Northlake Special Zone



The activities taking place on lots was also monitored through the in-person survey to establish if this was consistent with the consents granted. As seen in the table below 77% of developments within the Zone were for residential properties. The majority of the remaining consents (76% of remaining consents) were undeveloped while the remainder of the lots were used for a variety of purposes.

The outcomes observed are consistent with what is expected from the resource and building consent data. There are some differences between the number of consents for residential activities, as a result of consents for multi-unit development⁷. The establishment of reserves within the Zone also addresses the ecology and open space key resource management issues raised for the Zone.

⁷ RM180492 (20 units) and RM180795 (25 units)

Activity Taking place	Count	Percentage
Residential	652	78%
Undeveloped Lot	152	18%
other	23	4%
Commercial	9	1%
Grand Total	836	100%

Table 9 Building Type

Commercial and Retail Activities

Nine commercial activities were monitored in the consent data and in the in-person survey confirmed they were for offices for various companies across industries. The remaining commercial development was for a restaurant. These demonstrate the effectiveness of the Zone's provisions seeking the development of day-to-day commercial and retail activities for residents, including a small convenience store for daily needs.

As seen in the table below 85% of residential properties within the Zone are detached, single storey homes. The developments observed are consistent with Objective 1 for the Zone, with residential developments being of low and medium density. The development of semi-detached and terraced housing is also consistent with Objective 1 in the anticipated development of medium density housing within the Zone.

Residential Building Type	Count of Residential Building Type	Percentage
Detached House	536	85%
Semi-detached House	93	15%
Grand Total	629	100%

Table 10 Residential Building Type

Monitoring and Enforcement

The Zone has 43 recorded complaints to the monitoring and enforcement team. The complaints were recorded for various breaches, with Residential Visitor Accommodation activities being the most common (14).

A significant breach in the zone was related to repeated discharge of stormwater into Mata Au/Clutha River and resulted in enforcement action being taken by Otago Regional Council as a breach of section 15 of the RMA.

Department	Number of Complaints	Percentage
Monitoring and enforcement	37	86%
Noise Complaint	6	14%
Total	43	100%

Table 11 Complaints

Type of Complaint	Number of Complaints	Percentage
Residential Visitor Accommodation	14	38%
Building	10	27%
Resource Consents (earthworks)	5	14%
Reserve land	3	8%
Signs	1	3%
District Plan	2	5%
Litter	1	3%
No department listed	1	3%
Total	37	100%

Table 12 Type of Complaint

Density

The chapter provides density targets in the rules, shown below.

Density

The density of [residential units](#) within each Activity Area shall achieve limits set out in [Table 1](#) plus or minus fifteen per cent (15%).

Table 1:

Activity Areas	Density (residential units per hectare)
A & C4	N/A
B1 – B6	10
C1 – C3	4.5
D1	15

Density shall be calculated for each Activity Area on an individual basis on the gross area of land available for [development](#) and includes land vested or held as [reserve](#), [open space](#), [access](#) or [roading](#) but excludes the Building Restriction Area and Tree Protection Area and any land developed or intended to be developed for activities other than [residential activities](#).

This density measure is difficult to measure given the number of caveats set out in the plan. Spot monitoring of consents demonstrated that generally the densities within the zone were adhered to as part of the consenting process.

How Effective are the Special Zone Objectives, Policies and Rules?

Effectiveness of the Objectives

The Northlake Special Zone has six Objectives.

Objective 1: Residential Development ‘A range of medium to low density and larger lot residential development in close proximity to the wider Wānaka amenities.’

Objective 1 establishes that the desired outcome for residential development is a mixture of low and medium density residential properties, with higher densities in the centre of the Zone. The commercial precinct in Northlake is located centrally within the Zone, while the southern edge of the zone includes lots sizes which are comparable to the Proposed District Plan’s Large Lot Residential Chapter. The monitoring of developments establish that Objective 1 is effective.

Policies

Objective 1 contains nine policies which establish the desired outcomes for residential developments within the Zone.

Policy	Comment
1.1 To establish a mix of residential densities that will provide a residential environment appealing to a range of people.	Effective, there are a range of densities evident in the zone
1.2 To enable medium density living within the less sensitive parts of the zone in order to give Northlake a sense of place and to support a neighbourhood commercial and retail precinct.	Generally Effective – there is medium density housing established adjacent to the commercial precinct
1.3 To maintain and enable residential lot sizes in Activity Areas A and C4 consistent with the adjacent Rural Residential Zone.	Area A – achieved - effective Area C4 – achieved - effective
1.4 To enable and encourage low density residential activities within Activity Areas B1 – B6.	Achieved - effective
1.5 To enable and encourage larger residential lot sizes within Activity Areas C1 – C3.	Partially effective due particularly to the fast track consent, discussed further below.
1.6 To enable and encourage medium density residential activities within Activity Area D1.	Somewhat effective, the Retirement Village is at least medium density.
1.7 To provide for small scale neighbourhood retail activities including one small supermarket to serve the needs of the local	Generally effective. The zone provides a retail precinct at the scale anticipated by

community within Activity Area D1 and to avoid visitor accommodation, commercial, retail and community activities and retirement villages within Activity Areas other than within Activity Area D1.	the rules ⁸ . The retirement village consented through the fast track consent does not follow this policy due to the different consenting regime during Covid.
1.8 To provide for community activities, including educational facilities, to serve the needs of the Northlake community and to be available for use by the wider Wānaka community.	Somewhat effective. There are community facilities (parks, open spaces and paths, tennis courts, pump track for bikes) established as well as a daycare. Some community facilities suggested initially did not eventuate, however what has been established was considered and approved through a series of consents and PC 53.
1.9 To enable affordable housing by providing for cost effective development and by requiring a range of lot sizes and housing typologies, including 20 affordable lots (as defined in Rule 15.2.20.1).	Effective – Development in the zone is at range of scales and densities and provides (within the context of an expensive housing market) some affordable housing options and KiwiBuild housing ⁹ . The QLCHT has achieved housing in the zone, albeit at a lesser scale than set out due to development and market conditions.

Objective 2: Urban Design *‘Development demonstrates best practice in urban design and results in a range of high quality residential environments.’*

QLDC produced a Residential Design Guideline (2021 Residential Design Guideline) which has been used to assess if developments within the Zone. The Residential Design Guidelines establish what the best practices are for developments through 11 actions. The in-person survey of the zone confirmed the majority of developments being consistent with the outlined best practices. It was observed that throughout the Zone most properties were in close proximity to open spaces and reserves. Two activities were monitored which triggered as non-complying for breaching recession plane standards. This indicates that such breaches are not common within the zone, showing that the majority are compliant with the established standards for the Zone and the Residential Design Guidelines.

A majority of the development in the zone falls under developer provided design requirements¹⁰ which are linked to the properties within the zone by conditions on the title^{11,12}.

⁸ see RM220677

⁹ [Northlake – KiwiBuild Partnership announced](#)

¹⁰ [northlake-home-lots-design-control-guidelines-06-dec-2018.pdf](#)

¹¹ Consent Condition: Dwellings shall comply with the ‘Northlake Design Control Guidelines’ and require approval from Northlake Developments (NDL) or appointee prior to construction commencing. Northlake Developments (NDL) (or its successors and assigns) are the authority responsible for the design approval process

¹² [20efa0_80f19d25cb394baf82d4e9e3eac19fa8.pdf](#)

Policies

The policies of Objective 2 have been partially effective in delivering their outcomes. Policy 2.1 has been effective in the establishment of the Zones Structure Plan, with well-established Activity Areas setting out the development densities across the Zone. The primary roading network provided for in Policy 2.1 has also been developed. The other Policies of Objective 2 (2.2-2.8) have been partially effective, as they have promoted appropriate developments across the Activity Areas established through the Structure Plan however, however there are a relatively high proportion of Non-complying consents (18%).

2.1 To use a Structure Plan to establish: • The location of Activity Areas • The primary roading network • Required walking and cycle connections • Areas where buildings are prevented from occurring due to landscape sensitivity • Areas where existing vegetation forms an important landscape or ecological feature and should be protected	The structure plan is used and well-established—effective The primary roading network is established—effective Required walking and cycle connections Walking and cycling connections have been established, albeit there remain some connections which are still under formation. Ecological features are generally in place. Landscape sensitive controls – partially effective
2.2 To require development to be consistent with the Northlake Structure Plan.	Effective, the structure plan has been a clear guide for the development of the zone.
2.3 To require the use of Outline Development Plans in resource consent applications for Activity Areas B1 to B6, C1 to C4 and D1 in order to: • implement the objectives and policies of the Zone and the relevant Activity Area and the Northlake Structure Plan; • determine the general location of anticipated future activities and built form within the Activity Area; • achieve any required density range within the relevant Activity Area; • achieve appropriate integration of anticipated future activities.	Partially effective - Three Non-complying activities for outline plans were triggered, related to outline development plans proposing developments within Building Restriction Areas, Tree Protection Areas and for development not in line with the Structure Plan for Northlake.
2.4 To achieve a high level of integration through residential lot layout, street design, recreational areas (including walkways/ cycleways, parks and open spaces) and	Effective, the zone works as an integrated development and ODPs have been used to achieve this outcome.

landscaping through the resource consent process using Outline Development Plans.	
2.5 To ensure that development recognises and relates to the wider Wānaka character and is a logical extension of the urban form of Wānaka.	Effective, the zone is an extension of urban Wānaka in extent and form
2.6 To enable visitor accommodation, commercial, community activities, retirement villages and limited small scale retail activities including one small supermarket within Activity Area D1 to service some daily needs of the local community, while maintaining compatibility with residential amenity and avoiding retail development of a scale that would undermine the Wānaka Town Centre and the commercial core of the Three Parks Special Zone.	Mostly effective, the scale of non-residential development is appropriate within the zone context and does not seem likely to undermine other commercial zones within Wanaka. A small market/dairy has been established (an 'On the Spot', a Foodstuffs cooperative) within D1
2.7 To enable educational facilities to service the needs of the Wānaka community, while maintaining compatibility with residential amenity.	Effective. Preschool/daycare established in 2019, with a total roll of 84 tamariki ranging from 3 months to 5 years ¹³ .
2.8 Ensure the design and appearance of non-residential buildings is compatible with the character of the wider neighbourhood and considers variation in form, articulation, colour and texture and landscaping to add variety, moderate visual scale and provide visual interest, especially where facades front streets and public spaces.	Effective the urban form of the commercial units seem to be visually appropriate within the context.

Objective 3: Connectivity *'Development that is well-connected internally and to networks outside the zone'*

Effective. Two primary internal connection links have been constructed (Northlake Drive and Outlet Road) while four external connection points have also been constructed from Aubrey Road, giving access to Wānaka.

Policies

Policies under Objective 3 relate to the establishment of roading, cycling, and walking networks within the Zone. Such networks have been developed and can be considered effective. Policy 3.4 is the only policy not considered effective as it relates to public transport, which at this time is not present within the Northlake Zone or in the Upper-Clutha area.

Objective 4: Landscape and Ecology *'Development that takes into account the landscape, visual amenity, and conservation values of the zone.'*

¹³ [BestStart Pinnacles | Education Review Office](#)

Objective 4 establishes the importance of controlling development in ‘inappropriate’ areas in the Zone. The Rules and Provisions within the Zone have, in general, have been effective in preventing inappropriate developments from occurring.

4.1 To identify areas where buildings are inappropriate, including ridgelines, hilltops and other visually prominent landforms, and to avoid buildings within those areas.	Effective, the Structure Plan addresses this policy. Three resource consents were approved which occur in building restriction areas, these consents were for outline development plans.
4.2 To maintain and enhance the nature conservation values of remnants of indigenous habitat, and to enhance the natural character of the northeast margin of the zone.	Plantings in the access through Northlake to the DOC land beyond is provided but not yet mature.
4.3 To ensure that roads are designed and located to minimise the need for excessive cut and fill and to respect natural topographical contours.	Effective, roads are well placed relative to land contour
4.4 To ensure that trees within the Tree Protection Areas are retained, and that any individual trees that are removed or felled within TPA3 or TPA4 are progressively replaced with non-wilding species so as to ensure development is reasonably difficult to see from the Deans Bank Trail (northern side of the Clutha River), to retain a predominantly treed foreground when viewed from the Deans Bank trail, and to retain a predominantly treed background when viewed from Outlet Road.	Zone consents were triggered as Non-complying activities for breaching standards for building restriction areas and tree protection areas (3 in building restriction areas and 1 for a tree restriction area). This does indicate potential pressures for development on areas identified.

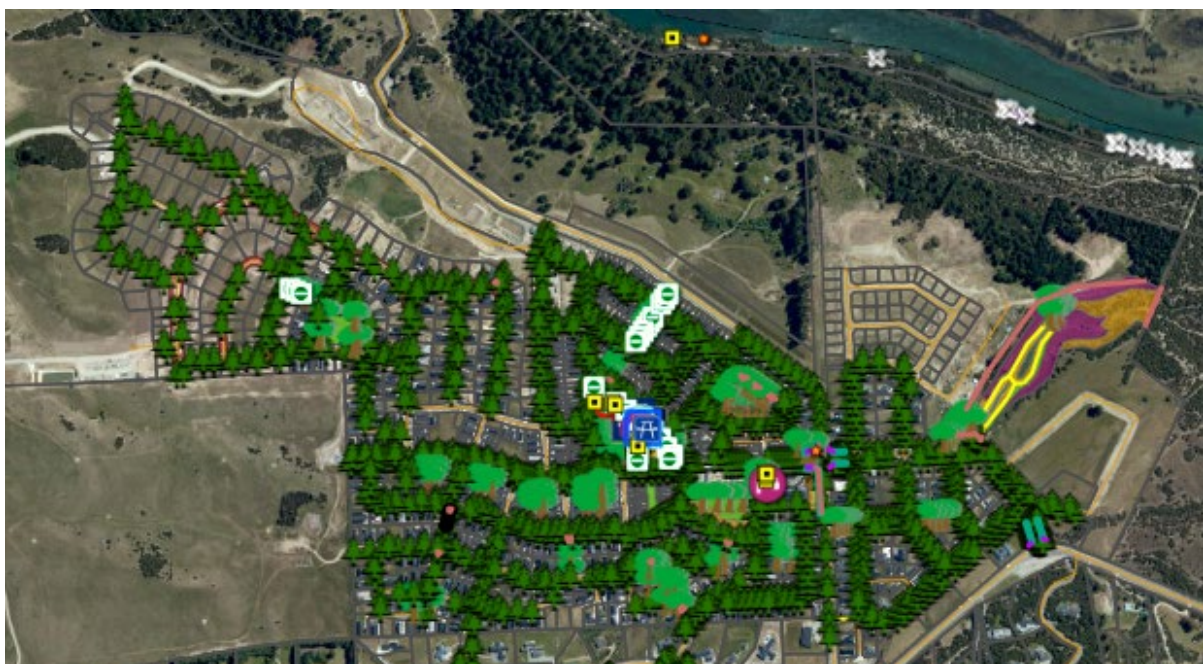


Figure 6 Open space and access in Northlake – QLDC map, Parks and Reserves Layer

Objective 5: Recreation ‘The establishment of areas of passive and active recreation’

Recreation reserves have been established in the Zone. Eleven sites in the Zone are reserves, which are spread across the Zone and perform a neighbourhood reserve function. A large open reserve is also present in the Zone (seen in image above), which consists of an open field, tennis court and skate park.

5.1 To identify areas for passive and active recreation and to encourage connections between recreational areas.	Effective – passive and active recreation opportunities are available in the zone
5.2 To ensure that community recreation areas are located on flatter areas within the zone.	Effective, reserves are not elevated
5.3 To encourage the provision of public access to the Clutha River.	Effective, access to Clutha/Mata Au remains via Outlet road.
5.4 To require provision of community facilities at an early stage in the development of the zone.	Not effective, the sequence of community facilities was not in step with initial development stages.

Objective 6: Infrastructure ‘Provision of servicing infrastructure to cater for demands of development within the zone in an environmentally sustainable manner and to enhance wider utility network systems where appropriate.’

The zone is well connected for transport and infrastructure, with a variety of access point in and out of the zone, as well as good connectivity to wider Wānaka and the adjacent Mata Au/Clutha River. Issues related to stormwater management mean that Objective 6 can only be considered partially effective.

6.1 To provide safe and efficient road access to the zone from Aubrey Road and Outlet Road.	Effective
6.2 To provide for transport network upgrades when required.	Effective
6.3 To design local streets to ensure safe, low speed traffic environments.	Effective
6.4 To utilise low impact design solutions that minimise adverse environmental effects resulting from storm water runoff	There have been stormwater management issues in the zone related to cumulative development site management.
6.5 To provide for water storage facilities for the benefit of the wider Council network as well as for the zone.	Effective, Northlake is supplied with water from a reticulated Council network from the Beacon Point Reservoir as well as a higher-level reservoir that services the higher lots within the Northlake development.

Effectiveness of the Rules

The effectiveness of the Rules of the Zone can be established through an analysis of the recorded activities taking place, and in turn through analysing the breaches that are occurring within the Zone. Breaches to standards indicate there is development pressure within the Zone in the rule. The percentage of consents being undertaken as non-complying activities (18%) indicates a difference between the desired outcomes outlined for the Zone and what standards proposed developments are wanting to achieve.

The most frequent breaches recorded related to the development of community activities and facilities in sequence with residential development, and for standards regarding the development of affordable housing lots. While the affordable housing and community facilities (to some extent) were eventually realised, the timing of these types of activities are important and were not sufficiently delivered alongside the course of the development. This demonstrates that the rules were not effective in achieving this outcome. Other breaches included:

- Maximum building coverage (6 breaches), all of which were relatively minor
- Maximum building height (5 breaches).

The five breaches for maximum building height standards varied in scale with the largest breach being 330 centimetres (over a maximum of 8 Metres), and the smallest 90 millimetres (over a maximum of 7 metres). Notably, the breaches to building height standards occurred on sloping sites

Eight consents recorded triggered as non-complying activities due to breaching standards for building materials and the light reflectance value (LRV) of such materials. It is of note that neither the Proposed District Plan's Lower and Medium Density Zones have standards for building materials, and under that zoning that would have been permitted¹⁴.

Is the Plan Efficient?

Consenting time and costs

The average Council resource consent charge in the zone was \$4,385 (including GST) as compared to an average across all ODP special zones of \$4,522, demonstrating that development within the zone is comparatively similar in terms of charges. National consenting data provided by the Ministry for the Environment shows that the average costs of a consent (any type) across NZ from 2014-2023 is \$3,062. The costs of consenting in Northlake are higher than consenting within NZ generally. Part of this may be due to the stage of land development within Northlake, most of which is for new subdivision and land use activities, and the requirement for consent in some of the activity areas for building construction.

¹⁴ Two resource consents (RM170368 and RM210550) were non-complying for the use of materials not listed as complying for the Activity Area in question. The remaining 6 consents were triggered due to the materials used containing a higher than permitted Light Reflectance Value (LRV), with such breaches ranging in scale. The largest breach is found in RM181066 where two skylights were included with a 100% LRV, with the maximum standard being 20%. The other non-complying breaches were more minor, with the remaining breaches ranging from 0.19% to 16%.

The framework of the zone requires an additional resource consent for Outline Development Plans to give effect to the Structure Plan prior to earthworks or subdivision. This approach may not have been as efficient as an alternate approach might have been.

Of the 231 consents in the dataset, 91% of the consents were processed within statutory timeframes, and only one decision was appealed, demonstrating that generally the provisions of the zone are able to be efficiently processed. However, changes sought outside the zone framework through fast track consenting and a private plan change signal that the zone may not always be working for landowners within the zone as the zone is developed.

Findings

In many cases, the Northlake Special Zone is successfully achieving its intended outcomes and meeting the expectations of both the community and the District Plan. This is further elaborated upon in the discussion of resource management issues and related objectives below.

Landscape and Amenity issues are addressed well through the development of the zone, it is a pleasant urban environment and retains views within the zone and beyond for a casual observer.

The **community** outcomes in the zone are not realised to the extent anticipated. There are some community facilities in Northlake, but were slower to be realised than the rules set out, and not at the same scale as implied at the formation of the zone. Small scale commercial development and a preschool contribute to the community development in the zone.

The **ecology** in the zone remains as anticipated, with pockets of native and non-native bush retained, alongside domestic residential plantings. Native plantings around stormwater and reserve land is evident in casual observation.

Open Space and Recreation are provided, there are paths throughout the neighbourhoods as well as open spaces and parks, play equipment, a tennis court and an outdoor gym. In more dense parts of the development there are open spaces at the rear of properties providing extra green space. Some open spaces also serve stormwater purposes which impact on their effectiveness relative to open space and recreation, and some paths remain still to be finalised as development continues to progress.

The zone is mostly developed as anticipated by the structure plan and the underlying outline development plans, and **efficient land use** is mostly realised as anticipated by the zone rules. A range of densities can be found across the Zone, with the building typology ranging from large lot residential to medium density residential housing. The desired spatial layout of the Zone is also achieved, with larger lots located in proximity to Aubrey Road and the fringes of the Zone while the residential areas adjacent to the Zone's commercial/retail precinct display have been developed at higher densities.

Infrastructure within the zone is provided for, however the zone has had challenges related to stormwater in particular. Prosecutions have been undertaken which show that at least some of the challenges related to stormwater may be outside the district plan rules.

Objectives and policies that have not performed as effectively are related to:

- The sequencing of community facilities alongside the stages of development.
- The scale of affordable housing
- The stormwater challenges in the zone

Additionally, over the last few years, planning changes sought outside the zone framework through fast track consenting and a private plan change signal the zone provisions may no longer be fit for purpose as Northlake and Wānaka continue to develop and evolve. Overall the zone has developed in line with what was anticipated by the Operative District Plan Northlake chapter.

Appendix 1 – Wider context of the Northlake Special Zone



Figure 7 Map of Wānaka Context

Appendix 3 – Photographs of Northlake Special Zone



Figure 8 Northlake Commercial (activity area D1), November 2024. Source: QLDC



Figure 9 Northlake Medium Density Development, views and Green Space, November 2024.

Appendix B: Statutory Assessment Tables

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Table 1: Evaluation of key relevant objectives and policies of the PDP

Provision	Assessment
Chapter 3 – Strategic Direction	
SO 3.2.2 - Urban growth is managed in a strategic and integrated manner.	The Request promotes urban development in an appropriate location and contributes to the strategic and integrated management of urban growth. It is immediately adjacent to, and integrates with, the existing urban area, with existing roading and servicing (with relevant upgrades), will be integrated with existing infrastructure, and can achieve a built environment that provides desirable, healthy and safe places to live and play. It is not “sporadic” because it adjoins and integrates with the existing urban zoning, and integrates with services, roading, open space and trail linkages, it is also within an identified UGB. It is not “sprawling” because it is contained by topography and where the landscape has ability to absorb the urban development in the form proposed. It can contribute to the mix of housing opportunities, and to housing affordability by providing more land for housing development, in line with the NPS-UD.
SO 3.2.2.1 - Urban development occurs in a logical manner so as to: (a) promote a compact, well designed and integrated urban form; (b) build on historical urban settlement patterns; (c) achieve a built environment that provides desirable, healthy and safe places to live, work and play; (d) minimise the natural hazard risk, taking into account the predicted effects of climate change; (e) protect the District’s rural landscapes from sporadic and sprawling urban development; (f) ensure a mix of housing opportunities including access to housing that is more affordable for residents to live in; (g) contain a high quality network of open spaces and community facilities; and (h) be integrated with existing, and proposed infrastructure and appropriately manage effects on that infrastructure.	
SO 3.2.3 - A quality built environment taking into account the character of individual communities.	The Request will ensure the existing development pattern of a high quality residential neighbourhood is continued.
SO 3.2.3.2 - Built form integrates well with its surrounding urban environment.	
SO 3.2.4 - The distinctive natural environments and ecosystems of the District are protected.	The Request includes direct mechanisms for enhancing the nature conservation values of the Site by the requirement for indigenous planting in the Native Grey Shrubland areas and for enhancing access through public trails. The delineation of both the ONL boundary and the existing UGB will ensure the natural character and quality and functions of the lake and Clutha River Mata-Au are protected.
SO 3.2.4.1 - Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.	
SO 3.2.4.3 - The natural character of the beds and margins of the District’s lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development.	
SO 3.2.4.4 - The water quality and functions of the District’s lakes, rivers and wetlands are maintained or enhanced.	
SO 3.2.4.5 - Public access to the natural environment is maintained or enhanced.	
SO 3.2.4.6 - The values of significant indigenous vegetation and significant habitats of indigenous fauna are protected.	
SO 3.2.4.7 - The survival chances of rare, endangered, or vulnerable species of indigenous	

Provision	Assessment
plant or animal communities are maintained or enhanced.	
SO 3.2.5 - The retention of the District's distinctive landscapes.	The Request locates development enabled by the proposed zonings, in the form proposed, where it can be absorbed by the landscape as set out in DOCUMENT 5 .
SO 3.2.5.1 - The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related landscape capacity are identified.	
SO 3.2.6 - The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.	The Request will contribute to peoples' and communities' wellbeing by providing housing and related amenities and the economic benefits that these provide.
SO 3.2.6.2 - A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.	
SP 3.3.4 - Avoid new commercial zoning of land that is likely to undermine the role of the Queenstown and Wānaka town centres as the primary focus for the District's economic activity.	The Request includes the identification of part of the developed part of the Site as Local Shopping Centre Zone, which is consistent with its role in providing local servicing and will not undermine the role that Wānaka town centre or Three Parks fulfil.
SP 3.3.11 - Avoid commercial rezoning that is likely to undermine the key local service and employment function role that the centres outside of the Queenstown and Wānaka town centres, Frankton and Three Parks fulfil.	
SP 3.3.15 - Apply provisions that enable urban development within the UGBs and avoid urban development outside of the UGBs.	The Request does not affect the existing UGB and will retain all urban development within its boundary.
SP 3.3.28 - Identify the District's Outstanding Natural Features and Outstanding Natural Landscapes on the District Plan web mapping application.	The Request includes the delineation of the ONL boundary on the Site where it is currently not shown in a logical and legible manner that ensures the landscape values of the ONL are protected.
SP 3.3.30 - Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.	
Chapter 4 – Urban Development	
Objective 4.2.1 - Urban Growth Boundaries used as a tool to manage the growth of urban areas within distinct and defensible urban edges.	The Request does not affect the existing UGB and will retain all urban development within its boundary. This, along with the structure plan mechanism, provides a distinct and defensible edge to the urban development.
Policy 4.2.1.3 - Ensure that urban development is contained within the defined Urban Growth Boundaries, and that aside from urban development within existing towns and rural settlements, urban development is avoided outside of those boundaries.	
Objective 4.2.2A - A compact, integrated and well designed urban form within the Urban Growth Boundaries that: i. is coordinated with the efficient provision, use and operation of infrastructure and services; and	The Request supports urban development within a UGB that is integrated with abutting residential zones, with development coordinated with the existing roading and servicing infrastructure.

Provision	Assessment
ii. is managed to ensure that the Queenstown Airport is not significantly compromised by the adverse effects of incompatible activities.	
Objective 4.2.2B - Urban development within Urban Growth Boundaries that maintains and enhances the environment and rural amenity and protects Outstanding Natural Landscapes and Outstanding Natural Features, and areas supporting significant indigenous flora and fauna.	The Request includes the delineation of the ONL boundary on the Site where it is currently not shown and locates it in a logical and legible manner that ensures the landscape values of the ONL are protected.
Policy 4.2.2.1 - Integrate urban development with existing or proposed infrastructure so that: a. Urban development is serviced by infrastructure of sufficient capacity; and b. reverse sensitivity effects of activities on regionally significant infrastructure are minimised; and c. in the case of the National Grid, reverse sensitivity effects avoided to the extent reasonably possible and the operation, maintenance, upgrading and development of the National Grid is not compromised.	The Request supports urban development within a UGB that is integrated with abutting residential zones with development coordinated with the existing roading and servicing infrastructure.
Policy 4.2.2.2 - Allocate land within Urban Growth Boundaries into zones which are reflective of the appropriate land use having regard to: a. its topography; b. its ecological, heritage, cultural or landscape significance if any; c. any risk of natural hazards, taking into account the effects of climate change; d. connectivity and integration with existing urban development; e. convenient linkages with public transport; f. the need to provide a mix of housing densities and forms within a compact and integrated urban environment; g. the level of existing and future amenity that is sought (including consideration of any identified special character areas); h. the need to make provision for the location and efficient operation of infrastructure and utilities, including regionally significant infrastructure; i. the need to provide open spaces and community facilities that are located and designed to be safe, desirable and accessible; j. the function and role of the town centres and other commercial and industrial areas as provided for in Chapter 3 Strategic Objectives 3.2.1.2 - 3.2.1.5 and associated policies; and k. the need to locate emergency services at strategic locations.	The Request allocates land in the manner sought in the policy, including: a. the topography – enabling development within the areas most suitable for development and disabling development in areas unsuitable for development; b. the existing ecological values are taken into account and enhanced; c. any natural hazard risk has been taken into account; d. there is connectivity and integration with the existing urban development both within the Site and with adjoining land; e. while there is no public transport with which to link to, connective walking and cycle trails are proposed; f. provision for a mix of housing densities and forms across the Site to create a compact and integrated urban environment; g. the existing level of amenity is high and will be continued on through the provisions; h. no requirement for additional regionally significant infrastructure; i. provision (through implementation of the Structure Plan) of open spaces, cycleways and walkways that are designed to be safe, desirable and accessible; j. no effect on the function and role of the town centre or Three Parks; and k. no need for location of emergency services.

Provision	Assessment
Policy 4.2.2.3 - Enable an increased density of well-designed residential development in close proximity to town centres, public transport routes, community and education facilities, while ensuring development is consistent with any structure plan for the area and responds to the character of its site, the street, open space and surrounding area.	Not relevant as not sufficiently close to these urban amenities to justify any increase in residential density.
Policy 4.2.2.4 - Encourage urban development that enhances connections to public recreation facilities, reserves, open space and active transport networks.	The Request includes the provision of recreation areas and trails to enhance connections to existing trail networks in the area.
Policy 4.2.2.5 - Require larger scale development to be comprehensively designed with an integrated and sustainable approach to infrastructure, buildings, street, trail and open space design.	The Request includes direct mechanisms for ensuring the existing development pattern of a high-quality residential neighbourhood is continued.
Policy 4.2.2.6 - Promote energy and water efficiency opportunities, waste reduction and sustainable building and subdivision design.	
Policy 4.2.2.7 - Explore and encourage innovative approaches to design to assist provision of quality affordable housing.	
Policy 4.2.2.8 - In applying plan provisions, have regard to the extent to which the minimum site size, density, height, building coverage and other quality controls have a disproportionate adverse effect on housing affordability.	
Policy 4.2.2.22 – (<i>Upper Clutha Basin specific</i>) Define the Urban Growth Boundaries for Wānaka and Lake Hāwea Settlement, as shown on the District Plan web mapping application that: a. are based on existing urbanised areas; b. identify sufficient areas of urban development and the potential intensification of existing urban areas to provide for predicted visitor and resident population increases in the Upper Clutha Basin over the planning period; c. have community support as expressed through strategic community planning processes; d. utilise the Clutha and Cardrona Rivers and the lower slopes of Mt. Alpha as natural boundaries to the growth of Wānaka; and e. avoid sprawling and sporadic urban development across the rural areas of the Upper Clutha Basin.	The Request does not affect the existing UGB and will retain all urban development within its boundary. This, along with the structure plan mechanism and its integrated landscape bunding and planting requirements, provides a distinct and defensible edge to the urban development to avoid sprawling and sporadic urban development that is integrated with the abutting urban residential development. Retaining urban development within the UGB is also consistent with the Spatial Plan, which has community support through the community planning processes undertaken during its promulgation.
Policy 4.2.2.23 - (<i>Upper Clutha Basin specific</i>) Rural land outside of the Urban Growth Boundaries is not used for urban development until a change to the Plan amends the Urban	

Provision	Assessment
Growth Boundary and zones additional land for urban development purposes.	
Chapter 5 – Tangata Whenua	
5.2.1 – Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan Policies	The relevant iwi authorities will be notified as part of the plan change process. Notwithstanding this, initial consultation has occurred.
Chapter 6 – Landscape and Rural Character	
Policy 6.3.1.1 - Categorise the Rural Zoned landscapes in the District as: a. Outstanding Natural Feature (ONF); b. Outstanding Natural Landscape (ONL); c. Rural Character Landscape (RCL)	The Request includes the delineation of the ONL boundary on the Site where it is currently not shown and in a logical and legible manner that ensures the landscape values of the ONL are protected. The Request includes direct mechanisms for enhancing the biodiversity values of the Site by the requirement for indigenous planting in the Native Grey Shrubland areas. The Request locates development enabled by the proposed zonings, in the form proposed, where it can be absorbed by the landscape as set out in DOCUMENT 5.
Policy 6.3.2.1 - Avoid urban development and subdivision to urban densities in the rural zones.	
Policy 6.3.2.5 - Avoid indigenous vegetation clearance where it would significantly degrade the visual character and qualities of the District's distinctive landscapes.	
Policy 6.3.2.6 - Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape values and nature conservation values would be maintained or enhanced, particularly where the subdivision or development constitutes a change in the intensity in the land use or the retirement of productive farm land.	
Policy 6.3.2.7 - Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Character Landscapes in proximity to an Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Outstanding Natural Feature or Outstanding Natural Landscape.	
Policy 6.3.2.8 - Encourage any landscaping to be ecologically viable and consistent with the established character of the area.	
Chapter 7 – Suburban Residential Zone	
Objective 7.2.1 - Development within the zone provides for a mix of compatible suburban densities and a high amenity residential living environment for residents as well as users of public spaces within the zone.	The Request enables SRZ development in locations that are capable of absorbing it from a landscape and amenity perspective and it can be serviced efficiently. The existing SRZ provisions will achieve the objectives.
Objective 7.2.3 - Encourage higher density development where it responds to the context and character of the locality and is designed to maintain amenity values.	
Objective 7.2.5 - Community activities serving the needs of people within the zone locate within the zone on sites where adverse effects are compatible with residential amenity values.	

Provision	Assessment
Objective 7.2.6 - Development efficiently utilises existing and planned infrastructure and minimises impacts on infrastructure networks.	
Objective 7.2.7 - Commercial development in the zone is small scale and generates minimal amenity value impact	
Objective 7.2.8 - Visitor accommodation, residential visitor accommodation and homestays are enabled at locations, and at a scale, intensity and frequency, that maintain the residential character and amenity values of the zone.	
Chapter 8 – Medium Density Residential Zone	
Objective 8.2.1 - Medium density development occurs close to employment centres which encourage travel via non-vehicular modes of transport or via public transport.	The Request locates MDRZ development in locations that reflect an existing higher density of development and that are serviced efficiently. The existing MDRZ provisions will achieve the objectives.
Objective 8.2.2 - Development contributes to the creation of a new, high quality built character within the zone through quality urban design solutions which positively respond to the site, neighbourhood and wider context.	
Objective 8.2.3 - Development provides high quality living environments for residents and provides reasonable maintenance of amenity values enjoyed on adjoining sites, while taking into account the changing future character intended within the zone.	
Objective 8.2.5 - Development efficiently utilises existing and planned infrastructure and minimises impacts on infrastructure networks.	
Objective 8.2.6 - Community activities serving the needs of people within the zone locate within the zone on sites where adverse effects are compatible with residential amenity values.	
Objective 8.2.7 - Commercial development is small scale and generates minimal adverse effects on residential amenity values.	
Objective 8.2.11 - Visitor accommodation, residential visitor accommodation and homestays are enabled at locations, and at a scale, intensity and frequency, that maintain the residential character and amenity values of the zone.	
Chapter 11 – Large Lot Residential	
Objective 11.2.1 - A high quality of residential amenity values are maintained within the Large Lot Residential Zone.	The location can absorb the LLRAZ development, in the form proposed, because the visual effects can be contained and the density provided for by the amended subdivision provisions will retain a high level of residential amenity. The bespoke provisions will control the bulk and appearance of built form within the LLRAZ.
Objective 11.2.2 - Predominant land uses are residential. Where appropriate, community and recreational activities also occur.	
Objective 11.2.3 - Visitor accommodation, residential visitor accommodation and homestays	

Provision	Assessment
are enabled at locations, and at a scale, intensity and frequency, that maintain the residential character and amenity values of the zone.	The proposed subdivision provisions enable a high level of control over landscaping and vegetation. The existing LLRAZ provisions will achieve Objectives 11.2.2 and 11.2.3.
Chapter 15 – Local Shopping Centre Zone	
Objective 15.2.1 - Local Shopping Centres provide a focal point for a range of activities that meet the day to day needs of the community at a limited scale that supplements the function of town centres.	The Request locates LSCZ development in a location that reflect an existing focal point for the community. The existing LSCZ provisions will achieve the objectives.
Objective 15.2.2 - Buildings respond to the existing character, quality and amenity values of their neighbourhood setting.	
Objective 15.2.3 - Adverse environmental effects received both within and beyond the zone are minimised.	
Chapter 21 – Rural Zone	
Objective 21.2.1 - A range of land uses, including farming are enabled while: a. Protecting the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; b. Maintaining the landscape character of Rural Character Landscapes and maintaining or enhancing their visual amenity values; c. Maintaining or enhancing amenity values within the rural environment; and d. Maintaining or enhancing nature conservation values.	The Request includes retention of the existing Rural zoning of land for the purposes of protecting the landscape values of the Dublin Bay ONL, maintaining amenity values and enhancing nature conservation values. The Structure Plan provides for trail network connections within the Rural Zone, to enable greater public recreation within the margins of Lake Wānaka.
Objective 21.2.12 - The natural character of lakes and rivers and their margins is protected, or enhanced, while also providing for appropriate activities, including recreation, commercial recreation and public transport.	
Chapter 27 – Subdivision and Development	
Objective 27.2.1 - Subdivision that will enable quality environments to ensure the District is a desirable place to live, visit, work and play.	The Request, including the proposed subdivision provisions, will support the development of the residential infill area as a high-quality urban form while also achieving the enhancement of indigenous biodiversity. Infrastructure is already present and has the capacity to service the area of residential infill development.
Objective 27.2.2 - Subdivision design achieves benefits for the subdivider, future residents and the community.	
Objective 27.2.4 - Natural features, indigenous biodiversity and heritage values are identified, incorporated and enhanced within subdivision design.	
Objective 27.2.5 - Infrastructure and services are provided to new subdivisions and developments.	
Chapter 38 – Open Space and Recreation Zones	

Provision	Assessment
Objective 38.4.1 – (<i>Informal Recreation Zone</i>) Use and development for informal recreation maintains and enhances the environment.	The Request includes Informal Recreation zoning of land for the purposes of a public lookout facility (known locally as “The Summit”). This, together with the proposed trail connections as provided for via the Structure Plan and provisions, is consistent with the purpose and objective of the Informal Recreation Zone enabling greater public access to this part of the margins of Lake Wānaka. Informal Recreation zoning is consistent with the treatment of other Council vested foreshore land, and that part of the zoning within the ONL will be subject to the separate landscape regime of Chapter 38 in accordance with Policy 6.3.1.5.

Table 2: Evaluation of key relevant provisions of the RPS21

Objective	Assessment
Integrated Management	
IM-O3 – Sustainable impact Otago's communities provide for their social, economic, and cultural well-being in ways that support or restore environmental integrity, form, functioning, and resilience, so that the life-supporting capacities of air, water, soil, and ecosystems are sustainably managed, for future generations.	The Request is a sustainable use of land within an existing urban environment that can absorb development and promote economic and social wellbeing for people and the local community, and will not adversely affect the life-supporting capacities of air, water, soil or ecosystems. The proposal will have the added benefit of providing for improved biodiversity outcomes through the proposed Native Grey Shrubland areas.
IM-P11 – Management of natural and physical resources When preparing regional plans and district plans, recognise and provide for the role and use of natural and physical resources in a way or at a rate that supports the social, cultural and economic well-being of Otago's communities now and in the future.	The Request is consistent with recognising and providing for the role and use of natural and physical resources. The provision of infill residential development on land that can absorb the development and can be serviced without adverse environmental effects is a sustainable way to support the social, cultural and economic well-being of the Upper Clutha community.
Fresh water	
LF-FW-O8 – Fresh water In Otago's water bodies and their catchments, the significant and outstanding values of Otago's outstanding water bodies are identified and protected.	The Request will not adversely affect the water quality and function of Clutha River Mata-Au or Lake Wānaka.
LF-FW-O10 – Natural character The natural character of wetlands, lakes and rivers and their margins is preserved and protected from inappropriate subdivision, use and development.	The Request includes the delineation of the ONL boundary which will ensure the natural character and quality and functions of the lake and Clutha River Mata-Au and their margins are protected.
LF-FW-P12 – Otago's outstanding water bodies Otago's outstanding water bodies are: (1) ... (2) Lake Wānaka and the outflow and tributaries described in the Lake Wānaka Preservation Act 1973, and (3)	The Request includes the delineation of the ONL boundary which will ensure the natural character and quality and functions of the lake and Clutha River Mata-Au are protected.
LF-FW-P13 – Identifying and managing outstanding water bodies Identify outstanding water bodies and their significant and outstanding values in the relevant regional plans and district plans and protect those values.	
LF-FW-P16 – Stormwater discharges Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by: (1) requiring:	The Request will coordinate development with the existing stormwater system to ensure effective and integrated stormwater management. DOCUMENT 9 confirms that the downstream infrastructure has sufficient capacity to accommodate the proposed development, with post-development stormwater flows to be

Objective	Assessment
(a) integrated catchment management plans for management of stormwater in urban areas, (b) all stormwater to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in the same or improved outcomes for fresh water, (c) implementation of methods to progressively reduce unintentional stormwater inflows to wastewater systems, (d) that any stormwater discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and (e) the use of water sensitive design techniques wherever practicable, and (2) promoting the reticulation of stormwater in urban areas where appropriate, and (3) promoting source control as a method for reducing contaminants in discharges and the use of good practice guidelines for managing stormwater.	managed through attenuation and treatment measures.
Land and soil	
LF-LS-O12 – Use, development, and protection The use, development, and protection of land and soil: (1) safeguards the life-supporting capacity of soil, (2) sustains the potential of land and soil to meet the reasonably foreseeable needs of future generations while recognising the extractive nature of mining, (3) contributes to achieving environmental outcomes for fresh water, and (4) recognises the role of these resources in providing for the social, economic, and cultural well-being of Otago's people and communities.	Being urban in nature, the majority of the Site subject to the Request has limited life-supporting capacity of soil due to the need to undertake significant earthworks for infrastructure purposes. However, the proposed Native Grey Shrubland planting will likely have positive benefits over time on soil quality, and the Request will maintain the health and well-being of the nearest water bodies.
LF-LS-P23 – Land use and fresh water The health and well-being of water bodies and freshwater ecosystems is maintained or, if degraded, improved to meet environmental outcomes set for FMUs and/or rohe by: (1) reducing or otherwise managing the adverse effects of direct and indirect discharges of contaminants to water from the use and development of land, (2) managing land uses that may have adverse effects on the flow of water in surface water bodies or the recharge of groundwater,	

Objective	Assessment
(3) recognising the drylands nature of some of Otago and the resulting low water availability, and (4) maintaining or, where degraded, enhancing the values of riparian margins.	
LF-LS-P27 – Public access Provide for public access to and along lakes and rivers by: (1) maintaining existing public access, (2) seeking opportunities to enhance public access, including access by mana whenua in their role as kaitiaki and for gathering of mahika kai, and (3) encouraging landowners to avoid restricting access unless it is necessary to protect: (a) health and safety, (b) significant natural areas, (c) areas of outstanding natural character, (d) outstanding natural features and landscapes, (e) places or areas with special or outstanding historic heritage values, or (f) places or areas of significance to Kāi Tahu, including wāhi taoka, wāhi tapu and wāhi tupuna, (g) establishing vegetation, or (h) a level of security consistent with the operational requirements of a lawfully established activity.	The Request includes public access trails to connect to the existing trail network that exists in the margins of Lake Wānaka and Clutha River Mata-au.
Ecosystems and indigenous biodiversity	
ECO-O2 – Restoring and enhancing Restoration and enhancement activities result in an overall increase in the extent and occupancy of Otago's indigenous biodiversity.	The Request includes proposed Native Grey Shrubland areas for both protection / maintenance and enhancement, which will improve the extent and occupancy of grey shrubland species on the site.
ECO-P7 – Maintaining indigenous biodiversity Except as provided for by ECO-P1, and excluding areas protected under ECO-P4, manage Otago's indigenous biodiversity by all of the following: (1) applying the effects management hierarchy (in relation to indigenous biodiversity) to manage significant adverse effects on indigenous biodiversity and recognising and providing for the protection of significant indigenous biodiversity values identified under ECO-M2(5), (2) requiring the maintenance of indigenous biodiversity for all other adverse effects of any activity, and (3) notwithstanding (1) and (2) above, for regionally significant infrastructure and nationally significant infrastructure that is either renewable electricity generation or the	

Objective	Assessment
National Grid avoid, remedy or mitigate adverse effects to the extent practicable, and (a) when significant indigenous biodiversity values are identified under ECO-M2(5), protecting those values in district plans.	
ECO-P8 – Restoration and enhancement The extent, occupancy and condition of Otago’s indigenous biodiversity is increased by: (2) restoring and enhancing habitat for indigenous species, including taoka and mahika kai species, (3) improving the health and resilience of indigenous biodiversity, including ecosystems, species, (4) ecosystem function, and intrinsic values, buffering or linking ecosystems, habitats and ecological corridors, ki uta ki tai, and (5) prioritising all the following for restoration: (a) significant natural areas whose ecological integrity is degraded, (b) threatened and rare ecosystems representative of naturally occurring and formerly present ecosystems, (c) areas that provide important connectivity or buffering functions, (d) areas of indigenous biodiversity on native reserves and Māori land where restoration is advanced by the Māori landowners, (e) any other priorities specified in regional biodiversity strategies or any national priorities for indigenous biodiversity restoration.	The Request includes proposed Native Grey Shrubland areas for both protection / maintenance and enhancement, which will improve the extent and occupancy of grey shrubland species on the site.
Energy, infrastructure and transport	
EIT-INF-O2 – Integration Development of infrastructure and land use change is coordinated, where appropriate.	The Request efficiently provides for urban development by locating it in an area where infrastructure (roading, water, wastewater and reticulated services) is already present and have the capacity (with upgrades if necessary) to service the proposed growth.
EIT-INF-P10 – Urban growth and infrastructure Provide for development infrastructure and additional infrastructure required to service existing, planned and expected urban growth demands in the short, medium and long term, taking in account UFD-P1 to UFD-P7.	
Transport	
EIT-TRAN-O10 – Effective, efficient, and safe transport Otago has an integrated air, land and water-based transport network that: (1) is effective, efficient and safe, (2) connects communities and their activities within Otago, with other regions, and internationally, and	While the Request will result in a number of additional vehicle movements as a result of the infill residential development proposed in the northwestern part of the Site, it will not have adverse effects on the efficient and safe operation of the transport network as set out in DOCUMENT 8.

Objective	Assessment
(3) is resilient to natural hazards and the effects of climate change, and the changing needs of communities.	
EIT-TRAN-O11 – Transport system The transport system within Otago supports the movement of people, goods and services, is integrated with land use, provides a choice of transport modes and is adaptable to changes in demand.	The Request will enable the integration of the land transport system with residential land use.
EIT-TRAN-P20 – Integration of the transport system The transport system contributes to the social, cultural and economic well-being of the people and communities of Otago through: (1) integration with land use activities and across transport modes, and (2) provision of transport infrastructure that enables safe and efficient service delivery in response to demand	
EIT-TRAN-P23 – Operation of the transport system The efficient and effective operation of the transport system is maintained by: (1) avoiding or mitigating adverse effects of activities on the functioning of the transport system, (2) avoiding the impacts of incompatible activities, to the extent reasonably practicable, including those that may result in reverse sensitivity effects, (3) avoiding or minimising the effects of activities and development so that the opportunity to adapt, upgrade or develop the transport system to meet future transport demand, is not compromised, (4) promoting the development and use of transport hubs that enable an efficient transfer of goods for transport and distribution across different freight and people transport modes, (5) promoting methods that provide more efficient use of, or reduce reliance on, private motor vehicles, including ridesharing, park and ride facilities, bus hubs, bicycle facilities, demand management and alternative transport modes, and (6) encouraging a shift to using renewable energy sources.	While the Request will result in a number of additional vehicle movements as a result of the infill residential development proposed in the northwestern part of the Site, it will not have adverse effects on the efficient and safe operation of the transport network as set out in DOCUMENT 8 .
Hazards and risks	
HAZ-NH-O1 – Natural hazards Activities do not exacerbate natural hazard risks within Otago, and are managed to reduce significant natural hazard risk.	The Request will not exacerbate natural hazard risk.

Objective	Assessment
Contaminated land	
HAZ-CL-O3 – Contaminated land Contaminated land and waste materials are managed to protect human health and do not harm Kāi Tahu values and the environment in Otago.	The risk from contaminated soil has been considered in DOCUMENT 11 which concludes that it is highly unlikely that there will be a risk to human health arising from the Request.
Natural features and landscapes	
NFL-O1 – Outstanding natural features and landscapes The areas and values of Otago’s outstanding natural features and landscapes are identified, and the use and development of Otago’s natural and physical resources results in the protection of them from inappropriate subdivision, use and development.	The Request includes the delineation of the ONL boundary on the Site where it is currently not shown in a logical and legible manner that ensures the landscape values of the ONL are protected.
NFL-P2 – Protection of outstanding natural features and landscapes Protect outstanding natural features and landscapes from inappropriate subdivision, use and development by: (1) maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, (2) avoiding, remedying or mitigating other adverse effects; and (3) managing the adverse effects of infrastructure on the values of outstanding natural features and landscapes in accordance with EIT-INF-P4 and EIT-INF-P9.	
Urban form and development	
UFD-O1 – Development of urban areas The development and change of Otago’s urban areas occurs in a strategic and coordinated way, which results in well-functioning urban environments, that: (1) accommodate the diverse and changing needs and preferences of Otago’s people and communities, now and in the future, (2) integrate effectively with infrastructure, development infrastructure and additional infrastructure, and surrounding urban areas and rural areas, including by managing reverse sensitivity effects and direct effects on electricity networks, (3) are consolidated, well-connected and have a well-designed urban form, (4) have effective and efficient infrastructure, development infrastructure and additional infrastructure,	The Request proposes to infill residential development in a strategic and coordinated way via the application of a Structure Plan, to result in a well-functioning urban environment by: (1) meeting the needs of Otago’s people and communities for additional land for housing; (2) connectivity and integration with the existing urban development (including infrastructure) both within the Site and with adjoining land; (3) enabling development within the areas most suitable for development and, while there is no public transport with which to link to, connective walking and cycle trails are proposed; (4) no requirement for additional, or adverse effects on, regionally significant infrastructure; (5) planting of Native Grey Shrubland areas will have the added benefit (beyond increasing

Objective	Assessment
(5) support climate change adaptation and climate change mitigation, and (6) takes into account the values and aspirations of iwi, hapū and whānau, including for urban development.	biodiversity values) of supporting climate change mitigation; and (6) the values and aspirations of tāngata whenua have been taken into account through consultation.
UFD-P1 – Strategic planning Strategic planning processes, undertaken at an appropriate scale and detail, precede urban growth and development and: (1) identify how housing choice, quality, and affordability will be improved, (2) ensure the integration of land use, urban intensification, and urban expansion with infrastructure, including how, where and when necessary development infrastructure and additional infrastructure will be provided, and by whom, (3) take into account whether urban expansion may contravene limits (in relation to freshwater), (4) demonstrate at least sufficient development capacity supported by integrated infrastructure provision for Otago's housing and business needs in the short, medium and long term, (5) maximise current and future opportunities for increasing resilience and reducing contributions of communities to climate change, and facilitate adaptation to changing demand, needs, preferences and climate change, (6) indicate how connectivity will be improved and connections will be provided within urban areas, (7) provide opportunities for iwi, hapū and whānau involvement in planning processes, including in decision making, to ensure provision is made for their needs and aspirations, and cultural practices and values, (8) facilitate involvement of the current community and respond to the reasonably foreseeable needs of future communities, and (9) identify areas of potential conflict between incompatible activities and sets out the methods by which these are to be resolved, including by consultation with infrastructure providers.	The Request is consistent with strategic planning processes already undertaken, including the Spatial Plan and the PDP review delineating the UGB. The Request includes a range of residential zones and densities providing for housing choice, while the additional housing supply to the market supports affordability. The application of the existing PDP zone standards and the continued use of design controls ensure a high quality of design will be achieved.
UFD-P3 – Urban intensification Manage intensification in urban areas, so that as a minimum the intensification: (1) contributes to establishing or maintaining the qualities of a well-functioning urban environment,	The Request manages intensification of residential development within the Site by: (1) including provisions that ensure the existing high quality of the urban form of Northlake is maintained over infill areas;

Objective	Assessment
(2) is well-served by efficient and effective infrastructure, development infrastructure and additional infrastructure, (3) enables heights and densities that meets the greater of demonstrated demand for housing and/or business use or the level of accessibility provided for by existing or planned active transport or public transport, (4) addresses issues of concern to iwi and hapū, including those identified in any relevant iwi planning documents, (5) protects the efficient and effective operation, maintenance, upgrading and development of nationally significant infrastructure and regionally significant infrastructure in accordance with EIT-INF-P7, and electricity distribution infrastructure in accordance with EIT-INF-P1, and (6) except as provided for in (5), limits, to the extent reasonably possible, the effects on operation, maintenance, upgrading and development of development infrastructure and additional infrastructure.	(2) confirming that the infill residential development can be serviced by the existing infrastructure; (3) enables heights and densities that are appropriate given the characteristics and location of the land and the relative demand for housing; (4) ensuring there are no issues of concern to tāngata whenua through consultation; and (5) having no effect on regionally or nationally significant infrastructure.

Table 3: Evaluation of key relevant policies of Iwi Management Plans

Provision	Assessment
MNRMP 2008	
3.4 Takitimu Me Ona Uri – High Country and Foothills	
3.4.10.1 Ensure protection and enhancement of the mauri or life supporting capacity of all high country and foothill waterways.	Urban development enabled by the Request will be serviced by the existing reticulated networks therefore there will be no discharge to water, supporting the mauri or life supporting capacity of the nearby Lake Wānaka and Clutha River Mata-au.
3.4.10.12 Promote the use of native species in new developments as a means of reducing the risk of plant pest spread	The Request includes proposed Native Grey Shrubland areas for both protection / maintenance and enhancement, which will improve the extent and occupancy of grey shrubland species on the site.
3.4.12.4 Promote the protection, restoration and enhancement of indigenous biodiversity	
3.5 Te Rā a Takitimu Southland Plains²⁴	
3.5.12.1 Avoid the use of water as a receiving environment for the direct, or point source, discharge of contaminants. Even if the discharge is treated and therefore considered “clean”, it may still be culturally unacceptable. Generally, all discharge must first be to land.	Urban development enabled by the Request will be serviced by the existing reticulated networks therefore there will be no discharge to water, supporting the mauri or life supporting capacity of the nearby Lake Wānaka and Clutha River Mata-au.
3.5.13.5 Avoid the use of water as a receiving environment for the direct, or point source, discharge of contaminants. Generally, all discharge must first be to land.	
3.5.13.6 Avoid impacts on water as a result of inappropriate discharge to land activities.	
3.5.17.4 Where practical, indigenous vegetation that is removed or damaged as a result of land use activity should be replaced.	The Request includes proposed Native Grey Shrubland areas for both protection / maintenance and enhancement, which will improve the extent and occupancy of grey shrubland species on the site.
3.5.17.6 Recommend the planting of indigenous species as an appropriate mitigation measure for any adverse impacts as a result of land use activity.	
KTMO NRMP 2005	
5.3.3 Wai Māori General Objectives	
iii. There is no discharge of human waste directly to water.	Urban development enabled by the Request will be serviced by the existing reticulated networks therefore there will be no discharge to land or direct discharge to water.
10.2.3 Wai Māori Policies in the Clutha/Mata-au Catchment	
9. To encourage the adoption of sound environmental practices, adopted where land use intensification occurs.	The Request provides for sustainable land use as it provides for efficient urban development in a location where it can be appropriately serviced, and in doing so, protect other land, as well as water, within the catchment.
10. To promote sustainable land use in the Clutha/Mata-au Catchment.	

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“Policies outlined in Section 3.5 Southland Plains provisions 3.5.10 – 3.5.20 are applicable and should be read in the context of activities occurring in, around, on or affecting high country waterways.”

Provision	Assessment
11. To encourage all consents related to subdivision and lifestyle blocks are applied for at the same time including, land use consents, water consents, and discharge consents.	
12. To require reticulated community sewerage schemes that have the capacity to accommodate future population growth.	

Table 4: Evaluation of key relevant provisions of the NPS-Urban Development

Provision	Assessment
Objectives	
Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.	The Request contributes to a well-functioning urban environment by enabling wellbeing through increasing housing stock and housing options in an established high quality residential development.
Objective 2: Planning decisions improve housing affordability by supporting competitive land and development markets.	The Request will increase the supply of land for housing in Wānaka and will therefore support a competitive land and housing market.
Objective 3: Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply: (a) the area is in or near a centre zone or other area with many employment opportunities (b) the area is well-served by existing or planned public transport (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.	The HBA2025 identifies that the Wānaka Ward is projected to absorb a much larger proportion of future district growth than historically, expecting to attract approximately 45% of all additional dwelling demand across the district over the next 30 years, resulting in a projected demand of an additional 12,200 dwellings in the Wānaka Ward by 2053. The Request, which will increase the supply of land for housing in Wānaka, is therefore consistent through enabling more people to live in this urban environment.
Objective 4: New Zealand's urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.	The development of the NSZ to date (including Plan Changes 53 and 54 and the Retirement Village Fast-Track Resource Consent) has been an example of an urban environment changing over time in response to the changing needs of the community. The Request continues to respond to change by being responsive to the need for more housing supply while retaining a high level of amenity for existing and future residents.
Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).	The Schedule 1 process of serving notice on tāngata whenua supports the principles of Te Tiriti o Waitangi.
Objective 6: Local authority decisions on urban development that affect urban environments are: (a) integrated with infrastructure planning and funding decisions; and (b) strategic over the medium term and long term; and (c) responsive, particularly in relation to proposals that would supply significant development capacity.	The Request integrates with existing infrastructure. The Request would contribute to the supply of development capacity over the medium and long term. Approval of the Request will help respond to existing and future demand.
Objective 7: Local authorities have robust and frequently updated information about their urban environments and use it to inform planning decisions.	The Council has up-to-date information in the HBA25.
Objective 8: New Zealand's urban environments: (a) support reductions in greenhouse gas emissions; and (b) are resilient to the current and future effects of climate change.	The Request indirectly supports this objective through the significant amount of native planting proposed in the Native Grey Shrubland Areas.

Provision	Assessment
Policies	
Policy 1: Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum: (a) have or enable a variety of homes that: - meet the needs, in terms of type, price, and location, of different households; and - enable Māori to express their cultural traditions and norms; and (b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and (d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and (e) support reductions in greenhouse gas emissions; and (f) are resilient to the likely current and future effects of climate change.	The Request will contribute to the functioning of the collective urban areas of the Upper Clutha, even though those areas are not necessarily physically contiguous, given the overall topography and the need to retain ONLs, ONFs and other features while accommodating growth. Individual urban areas have functional relationships that, when viewed as a whole, provide for the matters listed in Policy 1 for well-functioning urban environments. The Request will contribute to the whole by adding to: - the overall supply and variety of homes, their price and location; - natural spaces and open spaces and trail network connections; and - the competitive operation of the land and development market, by adding housing product into the market.
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.	The Request will contribute to the sufficiency of the development capacity to help meet expected demand for housing, and with limited additional provision for business land.
Policy 3: In relation to tier 1 urban environments, regional policy statements and district plans enable: (a) in city centre zones, building heights and density of urban form to realise as much development capacity as possible, to maximise benefits of intensification; and (b) in metropolitan centre zones, building heights and density of urban form to reflect demand for housing and business use in those locations, and in all cases building heights of at least 6 storeys; and (c) building heights of at least 6 storeys within at least a walkable catchment of the following: - existing and planned rapid transit stops - the edge of city centre zones - the edge of metropolitan centre zones; and (d) within and adjacent to neighbourhood centre zones, local centre zones, and town centre zones (or equivalent), building heights and densities of urban form commensurate with the level of commercial activity and community services.	Queenstown Lakes District is not a tier 1 urban environment.
Policy 4: Regional policy statements and district plans applying to tier 1 urban environments	Queenstown Lakes District is not a tier 1 urban environment.

Provision	Assessment
modify the relevant building height or density requirements under Policy 3 only to the extent necessary (as specified in subpart 6) to accommodate a qualifying matter in that area.	
Policy 5: Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of: (a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or (b) relative demand for housing and business use in that location.	When applying the standardised PDP zones, consideration was given to whether the Site (or parts of it) has a level of accessibility or relative housing demand that would justify greater building height and residential density than that already enabled through the UIV amendments to the zone provisions. In particular, consideration was given to whether the existing Activity Area A of the NSZ (located in the southern part of the Site adjacent to Aubrey Road) should be rezoned to a higher-density residential zone. However, given the absence of existing or planned public transport in Wānaka, together with the Site's distance from both the Town Centre and the Three Parks commercial centre, the Site does not meet the criteria for further upzoning under Policy 5(a). Instead, a very low density residential zoning was preferred to maintain a graduation between adjacent rural / rural living / large lot zoning and development and more intensive town centres or higher density areas.
Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters: (a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement (b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes: i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and ii. are not, of themselves, an adverse effect (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1) (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity (e) the likely current and future effects of climate change.	The Request provides for additional urban development capacity in a location and manner that is consistent with RMA planning documents, such as the Spatial Plan and PDP. Under clause (b), in the prioritised effort to give effect to the NPS-UD to achieve more diverse and affordable housing, current amenity values appreciated by some people may change, perhaps negatively, but such change is not in itself adverse, while amenity values appreciated by other people, being those that will live in and benefit from the housing provided in the urban environment, will be positive. While the proposed provisions seek to ensure a high level of amenity for the Northlake community, it is possible that the level of amenity currently experienced by some residents within the Site may change as a result of the infill residential development (as set out in DOCUMENT 5). However any reduction in amenity would not be to the extent that the urban development is no longer consistent with a well-functioning urban environment.
Policy 7: Tier 1 and 2 local authorities set housing bottom lines for the short-medium term and the long term in their regional policy statements and district plans.	The PDP includes Housing Bottom Lines at Chapter 4.1.2, identified through the 2021 HBA. The Site is included as within the Urban Environment for Wānaka Ward as included as Figure 2 in that section of the PDP.

Provision	Assessment
Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is: (a) unanticipated by RMA planning documents; or (b) out-of-sequence with planned land release.	The Request provides for additional urban development capacity in a location and manner that is consistent with RMA planning documents.
Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must: (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and (c) provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and (d) operate in a way that is consistent with iwi participation legislation.	Tangata whenua have been engaged in consultation on the Request and will be served notice via the Schedule 1 process.
Policy 10: Tier 1, 2, and 3 local authorities: (a) that share jurisdiction over urban environments work together when implementing this National Policy Statement; and (b) engage with providers of development infrastructure and additional infrastructure to achieve integrated land use and infrastructure planning; and (c) engage with the development sector to identify significant opportunities for urban development.	The Request is an example of the development sector engaging with local authorities in relation to opportunities for urban intensification.
Policy 11: In relation to car parking: (a) the district plans of tier 1, 2, and 3 territorial authorities do not set minimum car parking rate requirements, other than for accessible car parks; and (b) tier 1, 2, and 3 local authorities are strongly encouraged to manage effects associated with the supply and demand of car parking through comprehensive parking management plans.	The Request does not amend the existing PDP approach to car parking.

Table 4: Evaluation of key relevant provisions of the NPS-Indigenous Biodiversity

Provision	Assessment
The objective of this National Policy Statement is: - to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and - to achieve this: - through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and - by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and - by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and - while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.	The Request will result in positive outcomes for indigenous biodiversity in the Site and contribute to biodiversity within the wider surrounds. There is no overall loss of indigenous biodiversity.
Policy 1: Indigenous biodiversity is managed in a way that gives effect to the decision-making principles and takes into account the principles of the Treaty of Waitangi.	Tangata whenua have been engaged in consultation on the Request and will be served notice via the Schedule 1 process.
Policy 2: Tangata whenua exercise kaitiakitanga for indigenous biodiversity in their rohe, including through: - managing indigenous biodiversity on their land; and - identifying and protecting indigenous species, populations and ecosystems that are taonga; and - actively participating in other decision-making about indigenous biodiversity.	Kāi Tahu whānau exercise kaitiakitaka in the Mata-Au catchment and have been engaged with in relation to the Request and will be served notice via the Schedule 1 process.
Policy 3: A precautionary approach is adopted when considering adverse effects on indigenous biodiversity.	The effects of the Request on indigenous biodiversity are clearly understood through the comprehensive assessment (DOCUMENT 7) included with the Request, and which concludes that there will be overall positive effects on biodiversity values.
Policy 4: Indigenous biodiversity is managed to promote resilience to the effects of climate change.	The Request will result in a net gain in biodiversity in addition to the protection and ongoing maintenance of areas of existing grey shrubland. The additional planting, plus the ongoing management of all areas, will promote its resilience to the effects of climate change (such as increases in drought occurrence).
Policy 5: Indigenous biodiversity is managed in an integrated way, within and across administrative boundaries.	The Site does not cross administrative boundaries. The Request recognises the interconnectedness of the environment by providing for the ongoing protection of the indigenous biodiversity.

Provision	Assessment
Policy 6: Significant indigenous vegetation and significant habitats of indigenous fauna are identified as SNAs using a consistent approach.	The Site does not contain an identified SNA as defined.
Policy 7: SNAs are protected by avoiding or managing adverse effects from new subdivision, use and development.	The Site does not contain an identified SNA as defined.
Policy 8: The importance of maintaining indigenous biodiversity outside SNAs is recognised and provided for.	The overall ecological response recognises and provides for maintaining indigenous biodiversity outside of an SNA, as described in DOCUMENT 3 and DOCUMENT 7 .
Policy 9: Certain established activities are provided for within and outside SNAs.	The Site does not contain an identified SNA as defined.
Policy 10: Activities that contribute to New Zealand's social, economic, cultural, and environmental wellbeing are recognised and provided for as set out in this National Policy Statement.	The Request contributes to well-being through the provision of housing in a desirable location and in a manner which avoids, remedies and mitigates adverse effects on the environment.
Policy 11: Geothermal SNAs are protected at a level that reflects their vulnerability, or in accordance with any pre-existing underlying geothermal system classification.	Not relevant to the Request.
Policy 12: Indigenous biodiversity is managed within plantation forestry while providing for plantation forestry activities.	Not relevant to the Request.
Policy 13: Restoration of indigenous biodiversity is promoted and provided for.	The Request restores and enhances indigenous biodiversity on the Site.
Policy 14: Increased indigenous vegetation cover is promoted in both urban and non-urban environments.	The Request includes an increase in indigenous vegetation cover in both urban and non-urban environments.
Policy 15: Areas outside SNAs that support specified highly mobile fauna are identified and managed to maintain their populations across their natural range, and information and awareness of highly mobile fauna is improved.	The Site is not likely to support the specified highly mobile fauna species set out in Appendix 14 of the RPS21 as set out in DOCUMENT 7 .
Policy 16: Regional biodiversity strategies are developed and implemented to maintain and restore indigenous biodiversity at a landscape scale.	This is a policy or plan-making policy for the regional council.
Policy 17: There is improved information and regular monitoring of indigenous biodiversity.	DOCUMENT 7 sets out the effects of the Request on indigenous biodiversity in detail and has therefore improved the available information.