

**STATEMENT OF EVIDENCE OF DR SHAYNE GALLOWAY
ON BEHALF OF
JANE ELLEN TODD AND TRUSTEES OF GRAEME TODD FAMILY TRUST
(SUBMITTER #2)**

RECREATION AND OPEN SPACE PLANNING

20 March 2026

1. QUALIFICATIONS AND EXPERIENCE

1. My full name is Dr Shayne Galloway. I hold a Doctor of Philosophy (PhD) in Leisure Behaviour from Indiana University, with a focus on adventure education and education psychology. I also hold a Master of Science in Recreation Resource Management from Indiana University. My research and professional practice centres on outdoor recreation planning, spatial social-impact analysis, and place-based wellbeing in Aotearoa New Zealand.
2. I am the principal of Affordance Mapping NZ, a consultancy specialising in recreation resource management, recreation planning, and spatial analysis. I am also the founder and technical lead of the Digital Reef Charitable Trust, a civic technology organisation building public-interest information infrastructure for environmental and recreation monitoring in Aotearoa.
3. My professional background spans academic research and teaching in outdoor education and recreation (Indiana University, Utah Valley State College, University of Otago), recreation resource management consultancy, and accreditation and safety audit work for the adventure activities sector. I have provided expert evidence on recreation amenity in the Environment Court, before the High Court, and at district plan and resource consent hearings, including matters in the Queenstown Lakes District. My consultancy work includes recreation impact assessments, place attachment and user studies, and recreation facility planning for both public and commercial clients.
4. I am familiar with the Queenstown Lakes District and the Wakatipu Basin. I have visited the Hills Resort Zone and surrounding environment, including a site visit conducted on 4 March 2026, during which I observed the site from multiple vantage points including the submitter's property at 10 Advance Terrace, the multi-use trail corridor along McDonnell Road, and the internal access to the Hills Resort Zone.
5. I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023 and agree to comply with it. I confirm that I have considered all the material facts that I am aware of that might alter or detract from the opinions that I express, and that this evidence is within my area of expertise.

2. SCOPE OF EVIDENCE

6. I have been engaged by the submitter to provide expert evidence on the appropriateness of the proposed location of Activity Area SG (Sports Garden) from a recreation and open space planning perspective.
7. My evidence addresses a single question: whether Activity Area SG, as proposed in the plan change, is appropriately sited, or whether it should be relocated to a position more central to the resort's core facilities. I do not address the enlargement of Activity Area 4, nor other aspects of the plan change.
8. I have reviewed the following documents in preparing this evidence:

- (a) The notified plan change documentation, including the Request for Plan Change, Assessment of Environmental Effects, Section 32 Evaluation, and Design Statement;
- (b) The Hills Resort Zone Masterplanning Design Statement (May 2025);
- (c) The Section 42A Report and Statement of Evidence of Craig Alan Barr (Planning), dated 13 February 2026;
- (d) The Statement of Evidence of Bridget Gilbert (Landscape), filed with the Section 42A Report;
- (e) The Statement of Evidence of Jeffrey Andrew Brown (Planning) for The Hills Resort Limited, dated 13 March 2026;
- (f) The Statement of Evidence of Christopher William Day (Noise) for The Hills Resort Limited, dated 13 March 2026;
- (g) The Statement of Evidence of Brett Thomson (Masterplanning) for The Hills Resort Limited;
- (h) The Further Memorandum for The Hills Resort Limited regarding the erection of profile poles, dated 11 March 2026;
- (i) The submissions of Todd (#2) and Brown (#4);
- (j) Minute 1 (13 January 2026), Minute 2 (6 March 2026), and Minute 3 (13 March 2026) of the Independent Hearing Panel.
- (k) Photographs taken during my site visit on 4 March 2026 (Appendix 1).

3. SUMMARY OF OPINIONS

9. In summary, my evidence is that:

- (a) The proposed location of Activity Area SG on the northeastern periphery of the Hills Resort Zone is not the most appropriate location for this facility from a recreation planning perspective.
- (b) The siting of AA SG at the zone boundary transfers the amenity effects of a private recreation enterprise into the public domain, principally affecting the residential properties on Advance Terrace.
- (c) Standard recreation facility siting principles favour locating activity nodes centrally within a development, proximate to the primary service and access infrastructure, rather than at the periphery adjacent to sensitive receivers.
- (d) The scale of earthworks completed and ongoing within the Hills Resort Zone demonstrates that there is ample capacity to establish AA SG in a more central location, closer to the clubhouse (Activity Area C) or the proposed Golf Facilities area (AA GF).
- (e) Relocation of AA SG to a more central position would better achieve Objective 47.2.1 of the PDP, which requires that activities within the zone are located with particular regard to maintaining the amenity values of the zone and the surrounding environment.

4. THE PROPOSED ACTIVITY AREA SG

10. Activity Area SG is described in the plan change documentation as providing for “recreation activities for use by visitors and residents, including playing surfaces and courts, communal outdoor living and open spaces, and related activities” across an area of approximately 0.6 hectares.
11. The Masterplanning Design Statement elaborates that this area is intended to be a recreational and social facility, with tennis courts, pickleball courts, a half basketball court, a greenhouse, a tennis pavilion, and a refreshments area set within a landscaped garden framework. The requestor’s evidence refers to comparable facilities at Tara Iti and Te Arai Links golf resorts.
12. Following the submissions of Todd (#2) and Brown (#4), The Hills Resort Limited has amended the proposed provisions for AA SG. The key amendments, as set out in Mr Brown’s evidence, include reducing the maximum gross floor area of any building from 200m² to 60m², limiting the number of buildings to three, removing the provision for a restaurant, and limiting retail activity to one non-permanent food truck operating between 0800 and 2000 hours.
13. I acknowledge that these amendments narrow the scope of potential activity within AA SG. However, my concern is not primarily with the intensity of activity, but with the location of the activity area itself.

5. RECREATION FACILITY SITING PRINCIPLES

14. In recreation planning practice, the siting of activity facilities within a development is guided by a set of well-established principles. While these are applied with flexibility according to context, they provide a sound basis for evaluating the appropriateness of a proposed facility location.
15. The relevant principles applicable to this situation include:
 - (a) **Centrality to the user base.** Recreation facilities serving a defined membership or residential community are most efficiently and equitably located centrally within the development they serve. This minimises travel distances, maximises convenience, and reinforces the spatial coherence of the resort as an integrated offering.
 - (b) **Proximity to supporting infrastructure.** Sport courts and social recreation spaces benefit from co-location with service infrastructure - kitchen facilities, changing rooms, car parking, and management oversight. The clubhouse (Activity Area C) and the proposed Golf Facilities area (AA GF) already provide this infrastructure.
 - (c) **Minimisation of off-site effects.** Where a recreation facility generates noise, lighting, traffic, or visual effects, standard practice is to site it where these effects are internalised within the development rather than externalised to neighbouring properties or public spaces. This is especially important where the receiving environment includes residential areas and public recreation corridors.

(d) **Avoidance of boundary-proximate siting.** Placing active recreation facilities at the edge of a development, adjacent to a zone boundary with a different land use character, creates interface conflicts. The effects of the activity - noise from court sports, lighting, vehicle movements, social activity - fall disproportionately on neighbours who derive no benefit from the facility.

16. These principles are not unique to New Zealand. They are reflected in Sport New Zealand facility planning guidance, in Recreation Aotearoa best practice, and in the broader international literature on recreation facility planning.

6. SITE OBSERVATIONS - 4 MARCH 2026

17. I visited the site on 4 March 2026 and made the following observations relevant to the siting of AA SG. A map indicating the relative locations of 10 Advance Terrace and the supplied structural plans and pole locations is attached as Appendix 1.

18. **Location of AA SG relative to the zone boundary.** The proposed AA SG is located in the northeastern portion of the Hills Resort Zone, immediately south of the main vehicle entrance and immediately west of McDonnell Road. It is positioned at the periphery of the resort, proximate to the boundary with the Suburban Residential Zone to the northeast (Advance Terrace properties).

19. **Relationship to Advance Terrace.** The property at 10 Advance Terrace (Todd, Submitter #2) is located on the Arrowtown escarpment approximately 400 metres from the proposed AA SG. The neighbouring property at 18 Advance Terrace (Brown, Submitter #4) is approximately 375 metres distant. While this distance provides some attenuation of noise, the elevated position of these properties means they have a direct and unobstructed sightline to the proposed activity area. The concerns raised in the Todd submission are not merely visual; they relate to the character of the activity that would be introduced to a part of the zone that is currently open space.

20. I also note that the McDonnell Road corridor, which adjoins the proposed AA SG, accommodates a multi-use trail forming part of the wider Queenstown Trail network. While the trail was not a matter raised in the Todd submission, its presence is relevant context for the Panel's assessment of the character of the surrounding environment for the purposes of Objective 47.2.1.

21. **Scale of earthworks and capacity for alternative siting.** The Hills Resort Zone is a substantial landholding bounded by McDonnell Road, Arrowtown–Lake Hayes Road, and Hogans Gully Road. During my site visit, I observed substantial earthworks completed and ongoing across the property, associated with the golf course rerouting. The scale and extent of earthwork activity demonstrates that the requestor has both the capacity and the operational precedent to modify landform to accommodate facilities. A sports court facility of 0.6 hectares is a modest footprint that could be established in multiple locations within the zone. The assertion that this facility can only be located in the proposed northeastern position is not supported by any physical, topographical, or operational constraint that I could identify on site.

22. **Proximity to the clubhouse and core facilities.** Activity Area C (the clubhouse), the proposed Golf Facilities area (AA GF), and the proposed helicopter landing area (AA H) form a cluster of resort service infrastructure in the central-western portion of the zone. A recreation facility such as AA SG would sit logically within or adjacent to this service cluster, co-locating social and sporting activity with existing parking, hospitality, and management infrastructure. The Masterplanning Design Statement's own description of the facility as "an informal area away from 'golf' where visitors and residents can socialise" does not require physical separation from the resort core; it describes a functional distinction, not a spatial one.

7. TRANSFER OF EFFECTS INTO THE PUBLIC DOMAIN

23. The fundamental issue with the proposed location of AA SG is that it transfers the amenity effects of a private recreation enterprise into the public domain.
24. The Hills Resort Zone is a private members' resort. The sports garden facility is intended for the exclusive use of members, residents, and their guests. The benefits of the facility accrue entirely to the private enterprise and its clientele. However, by siting this facility at the periphery of the zone, adjacent to the boundary with the Suburban Residential Zone, the effects of the facility — noise from court sports, visual presence of built form and activity, potential lighting spill, and the general intensification of activity at the boundary — are externalised to neighbouring residents who derive no benefit from the enterprise.
25. This is a classic case of effects externalisation. The requestor captures the benefit (a sports and social amenity for members), while neighbouring residents bear the cost (reduced amenity from noise, visual change, and activity at the zone boundary).
26. This concern is distinct from the technical noise compliance question addressed by Mr Day. I accept Mr Day's evidence that noise from tennis and pickleball at 375 metres is likely to comply with the district plan noise limits. Compliance with a numerical noise standard, however, does not address the broader question of whether the siting of the facility is appropriate in terms of the character and amenity of the surrounding environment. Objective 47.2.1 requires that activities are located with particular regard to maintaining the amenity values of the zone and the surrounding environment. The amenity of the Advance Terrace properties is characterised by a rural/open space setting. The introduction of a formalised sports court facility — with associated built form, hardcourt surfaces, fencing, and social activity — at this interface changes that character, even if noise levels technically comply.
27. I note that Mr Brown's evidence acknowledges that AA SG could be used as a venue for temporary events under Chapter 35 of the PDP. This further reinforces my concern: the facility, once established with permanent infrastructure including toilets and a pavilion, creates a platform for periodic intensification of activity at the zone boundary.

8. ALTERNATIVE SITING

28. I consider that a more appropriate location for AA SG would be within or adjacent to the cluster of resort service infrastructure centred on Activity Area C (the clubhouse). The specific location would be a matter for the requestor's design team, but as a general proposition, locating the sports courts and gardens facility:

- (a) closer to the clubhouse and its associated parking, hospitality, and management infrastructure;
- (b) centrally within the zone rather than at the periphery;
- (c) away from the interface with the Suburban Residential Zone;

would better achieve Objective 47.2.1 and would be consistent with standard recreation facility siting practice.

29. I acknowledge that the requestor's golf course rerouting constrains the available locations for ancillary facilities. However, the zone is a substantial landholding, substantial earthworks are already underway, and a 0.6 hectare sports court facility has modest siting requirements. The constraint is not the absence of alternative locations; it is the requestor's design preference for this particular location.

30. In reaching this view, I have considered that the Todd submission (#2.1) specifically sought relocation of AA SG to Activity Area C as an alternative to rejection. I consider this to be a reasonable and practical alternative that merits serious consideration by the Panel.

9. RESPONSE TO REQUESTOR AND COUNCIL EVIDENCE

31. Mr Barr's Section 42A report (paragraphs 10.3–10.7) addresses the Todd (#2) and Brown (#4) submissions regarding AA SG. Mr Barr relies on Ms Gilbert's landscape evidence, which assesses the visual effects as low and recommends that both submissions be rejected. I do not take issue with Ms Gilbert's visual assessment from a landscape perspective. However, my evidence addresses a different question: not whether the facility will be visually prominent, but whether the facility is appropriately located from a recreation planning and amenity perspective. Visual prominence is one dimension of amenity; the character of activity at a zone boundary interface is another.

32. Mr Brown's evidence (paragraphs 3.26–3.35) accepts Mr Barr's recommendation that the submissions be rejected, subject to the amendments to the AA SG provisions. While I acknowledge that the amendments reduce the scale of built form and activity potential, they do not address the fundamental siting concern. A more limited facility in an inappropriate location remains inappropriately located.

33. Mr Day's noise evidence demonstrates that noise from court sports is likely to comply with district plan limits at the submitters' properties. As noted above, I accept this technical assessment. My concern is not with numerical noise compliance but with the broader amenity implications of siting an active recreation facility at the zone boundary, and the principle of effects externalisation.

10. CONCLUSION AND RELIEF SOUGHT

34. For the reasons set out in this evidence, I consider that the proposed location of Activity Area SG is not the most appropriate location for this facility. The siting transfers the amenity effects of a private enterprise into the public domain, affecting residential neighbours. Standard recreation facility siting principles favour a more central location within the resort, proximate to the existing and proposed service infrastructure.

35. I recommend that the Hearing Panel either:

- (a) Decline to approve the proposed location of Activity Area SG and direct that it be relocated to a position more central to the resort, within or adjacent to the Activity Area C / GF cluster; or
- (b) If the Panel is not minded to direct relocation, impose additional conditions on the location, orientation, and operational parameters of AA SG to ensure that off-site amenity effects are minimised and that Objective 47.2.1 is achieved.

Dr Shayne Galloway

Affordance Mapping NZ

20 March 2026