

18 September 2026

**The South Island Office
C/- Brown and Company Planning Group
PO Box 1467
QUEENSTOWN**

PRIVATE PLAN CHANGE REQUEST TO THE PROPOSED DISTRICT PLAN

PPC 4: Corbridge Resort Zone

REQUEST FOR FURTHER INFORMATION

Tēnā koe **Morgan and Jeff**,

This request for further information seeks to better understand the nature of the private plan change request in respect of the effect it will have on the environment, and how any potential effects are being managed, the benefits and costs and possible alternatives, and the nature of any consultation undertaken. The information sought is considered to be appropriate to the actual or potential environmental effects anticipated from the implementation of the plan change request.

It has been made pursuant to Clause 23 of Schedule 1 of the RMA 1991, which outlines:

(1) Where a local authority receives a request from any person under [clause 21](#), it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—

(a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of [Schedule 4](#); or

(b) the ways in which any adverse effects may be mitigated; or

(c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or

(d) the nature of any consultation undertaken or required to be undertaken—

if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.

The Council has sought comment on the proposal from relevant staff and expert consultants to help inform the requests for information under cl 23 of the First Schedule. When expert input has been considered, it has been stated. However, no formal reports were commissioned in accordance with cl 23(3) of the First Schedule.

Executive Summary

This request seeks information that will assist with better understanding the effects of the proposal on the Plan Change site and its surrounding environment, mitigation measures to address adverse effects, the benefits and costs of the proposal regarding its efficiency compared to alternative outcomes and to understand the consultation has been undertaken regarding the proposal. This includes requesting information regarding the following documents included within the Plan Change Application (version dated 24 August 2026).

- Corbridge Provisions (Document 2)
- Corbridge AEE (Document 3)
- Corbridge Section 32 (Document 4)
- Contextual Landscape Design Plans (Document 5b)
- Landform Visualisation Package (Document 5c)
- Ecological Assessment (Document 6)
- Landscape Assessment (Document 7)
- Infrastructure Assessment (Document 10)
- Transportation Assessment (Document 11)

The proposal has been assessed by both internal council staff and external experts. The information requested relates to the following fields of expertise:

- Planning
- Parks and Reserves Planning
- Transportation Planning
- Three Waters Infrastructure
- Landscape Architecture
- Ecology

Planning Information Requested

The Applicant's Plan Change Request has been reviewed by planning policy staff and a consultant planner to assess whether further information is required related to planning. The information requested in this section relates to the application's provisions (Document 2), the Assessment of Effects on the Environment (AEE) (Document 3), the Section 32 Analysis Report (Document 4) and how the plan change request incorporates and/or addresses the existing paper roads located within the proposed Zone.

Corbridge Provisions (Document 2)

Rule 51.5.14

The Section 32 Report states that the proposed provisions are intended to ensure a predominance of visitor accommodation and limit purely residential activity. However, Rule 51.5.14 permits residential occupation of Visitor Accommodation Units for up to 180 nights per annum per unit. The Section 32 Report has not explained why 180 days is selected.

This is important, as the definition of a resort relies on the development principally providing for visitor accommodation. Council estimates that, on the basis of 180 permanent residential units, with 180 days residential use of the balance of VA units, that residential use would constitute approximately 64% of unit occupancy.

Information requested pursuant to cl23(1)(a) of the First Schedule

1. Provide an assessment of the maximum extent of residential occupation that could occur under Rule 51.5.14, including whether all Visitor Accommodation Units could utilise the 180-night allowance in the same year.
2. Provide an explanation of how that outcome is considered consistent with the objective and policy framework requiring the Zone to principally provide visitor accommodation and visitor industry activities while enabling only limited residential activity.
3. Provide details of any provisions, controls or management mechanisms that would ensure visitor accommodation remains the predominant use of the Visitor Accommodation Units over time.
4. Provide the reasons why a 180-night threshold was selected, including any analysis undertaken of alternative thresholds and the resulting balance between visitor accommodation and residential use.

Structure Plan

The proposed Structure Plan (SP) for the Corbridge Resort Zone does not include all of the necessary information for the local authority (QLDC) to understand the nature of the request in respect of the effect the associated rules will have on the environment. The information requested regards the Wānaka Airport Outer Control Boundary in relation to the SP, clarification on the size of an activity area, and information regarding existing paper roads, all of which are not shown on the SP nor addressed in the current proposal.

Information requested pursuant to cl23(1)(a) of the First Schedule

5. Amend the Structure Plan so the Wānaka Airport Outer Control Boundary is identified in the structure plan.

6. Include the area (in hectares) applying to Activity Area H in the Structure Plan.
7. Include the existing paper roads located within the Structure Plan.
8. Provide an assessment of how the paper roads will be incorporated into the Zone's Structure Plan.

Table 51.4

While it is acknowledged that an existing consent RM100152 exists for an irrigation lake, it is apparent from recent aerial photography that the lake is no longer present, with the area covered in cropping. It is not clear from the information provided that this consent is relied upon for the purpose of the lake, or whether additional works and consents will be required. This information will also need to be reflected in the AEE.

Information requested pursuant to cl23(1)(a) of the First Schedule

9. Provide information on the activity status for the establishment of the lake in Activity Area L.
10. Clarify whether additional works and consents will be required for the establishment of the lake in Activity Area L, or if the information provided is reliant on consent RM100152.

Rule Chapter 27 Subdivision

The subdivision provisions appear to make staging under Rule 27.7.34B.2 a non-complying activity. The provisions do not appear to provide a status for non-compliance with staging. If this is the case, the Rule will need to be set up as a cascading Rules within Chapter 27. Clarification is also needed regarding whether golf areas and LAMA's intend to be produced by consent notices.

Information requested pursuant to cl23(1)(a) of the First Schedule

11. Clarify if the intention that subdivision complying with the staging rule is provided for in the proposed Chapter 27 provisions, but non-compliance with the proposed staging provisions is a non-complying activity.
12. Clarify whether the protection of open space, golf areas and LAMA is intended to be protected by way of consent notices, and whether any update of the provisions is required.

Assessment of the Effects on the Environment (Document 3)

Consultation

Schedule 1, clause 22(2) of the RMA requires that 'where environmental effects are anticipated, the request shall describe those effects, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement, or plan.'¹ Schedule 4 Clause (6)(1)(f) requires information is provided regarding any consultation undertaken and any response to the views of the person consulted.

Information requested pursuant to cl23(1)(d) of the First Schedule

13. Include in the AEE and/or s32 Report any views of persons consulted and any response from the applicant.

¹ [Resource Management Act 1991. First Schedule Part 2. Clause 22\(2\).](#)

Cultural effects

Schedule 4 Clause 7(1)(a) requires that an assessment of effects must address cultural effects. These have not been addressed in the AEE.

Information requested pursuant to cl23(1)(a) of the First Schedule

14. Provide an assessment of cultural effects in the AEE, in particular in relation to waterbodies and landscape values.

Activity Area L

Further information is requested to better understand the existing hydrological conditions of Activity Area L and the proposed lake within the activity area.

Information requested pursuant to cl23(1)(a) of the First Schedule

15. Include further information on the hydrological conditions supporting the proposed lake in Activity Area L, including any works required for establishment of the lake, inflow/outflow, management of water quality, depths, and management of waterfowl (particularly in relation to risk from birdstrike). Where appropriate, reference should be made to the scope of existing consent RM100152, its conditions and advice note.

Section 32 Report (Document 4)

Strategic Policies

The ecological report identifies areas of significant indigenous vegetation and significant habitat but the Section 32 Report does not make an assessment regarding this. The report also does not address the State Highway Network in relation to regionally significant infrastructure. There also does not appear to be an assessment against SP 3.3.33 (regarding rural character landscapes) within the s32 Report.

Information requested pursuant to cl23(1)(a) of the First Schedule

16. Provide an assessment in the section 32 report against SP 3.3.18 or 3.3.19.
17. Clarify why the assessment against SP 3.3.24B addresses the Wānaka Airport but does not address the State Highway Network in relation to regionally significant infrastructure.
18. Clarify if there is an assessment against SP 3.3.33.

National Policy Statement for Highly Productive Land (NPS-HPL)

In the assessment of the NPS-HPL, the Section 32 Report states that, as defined in the National Planning Standards², “urban” is a description of land that includes any special zone. That appears to be a reference to the interpretation section in the NPS-HPL, not the National Planning Standards.

Information requested pursuant to cl23(1)(a) of the First Schedule

19. Clarify that the definition of “urban” is from the provisions in the NPS-HPL and not the National Planning Standards.

² Section 32 Report (Document 4) Section 7 Page 59

Parks Information Requested

The Plan Change Request has been reviewed by an internal Parks and reserves planner at QLDC to assess whether further information is required related to Parks & Reserves. Further information is requested regarding Documents 5b (Contextual Landscape Design Plans) and 6 (Ecological Assessment).

Contextual Landscape Design Plans (Document 5b)

Pedestrian/cycle connectivity

Further information is requested regarding the location of public accesses within the proposed Zone. Pedestrian and cycle routes should be shown on the Structure Plan to connect areas of public amenity i.e the central lake and resort facilities with the state highway and the walking/cycling track to the Clutha Mata-Au River.

Information requested pursuant to cl23(1)(a) of the First Schedule

20. Provide a public access plan that clearly shows where public access will be permitted/provided (in addition to the cycle/walkway shown on the proposed Structure Plan) and how these areas are connected on the Structure Plan.

Ecological Assessment (Document 6)

Existing exotic shelter belts

Further information is requested to better understand the proposal regarding the existing shelter belts of exotic vegetation within the proposed Zone. The successional replacement of these shelterbelts with appropriate species does not appear to be included in the provisions.

Information requested pursuant to cl23(1)(a) of the First Schedule

21. Provide an assessment of the effects of the retention of the existing exotic shelterbelts, particularly those comprising wilding species.
22. Clarify whether the proposal will include a provision to address the successional replacement of the existing exotic shelterbelts with appropriate species.

Transport Information Requested

The Plan Change Request has been reviewed by an external Transport planner to assess any information requirements related to transport. Further information is requested regarding the Transport Assessment (Document 11) and the proposed provisions (Document 2).

Transport Assessment (Document 11)

State Highway 6 (SH6) access, network effects and intersection performance (Section 7.1, 7.2 and 8.3)

Further information is requested regarding the proposed access to the Zone from SH6 and the existing driveway(s) which are opposite Ballantyne Road to better understand the nature of the Plan Change Request regarding traffic effects on the State Highway.

Information requested pursuant to cl23(1)(a)- (c) of the First Schedule

23. Confirm that there will only be one road access on SH6 per the Structure Plan and the indicative masterplan, that the existing driveway(s) opposite Ballantyne Road will be closed, and at what stage this will occur. Provide any amended provisions proposed.
24. Provide an assessment of alternative long-term SH6 access arrangements, including a shared intersection/roundabout arrangement servicing both Ballantyne Road and the proposed Zone, which would provide a more appropriate long-term safety and network outcome.
25. Confirm whether the cumulative traffic effects on the wider SH6 corridor, including the SH6/SH84 roundabout, have been assessed and, if so, provide the outcomes of that assessment, and appropriate mitigations to any adverse effects.

Trip generation and transport modelling assumptions (Sections 6 and 7)

Further Information regarding the sensitivity testing of the transport modelling and the proposed transport mitigation measures is requested to better understand the assumptions used in the development of the traffic effect and the wider traffic effects of the proposal.

Information requested pursuant to cl23(1)(a)- (c) of the First Schedule

26. Provide sensitivity testing of the transport modelling assumptions, including alternative assumptions regarding internal trip capture, visitor accommodation occupancy, worker accommodation travel patterns, worker accommodation demand and traffic generation.
27. Confirm how proposed transport mitigation measures and upgrade triggers would respond if actual development staging, visitor accommodation yields or traffic generation differ from the assumptions used in the transport assessment.

Trip generation assumptions (Section 6)

All 290 visitor accommodation units are assessed using a short-stay visitor rate of 0.3 movements per occupied unit in the peak hour and three movements per occupied unit per day, together with an 80% occupancy factor. However, per Document 2 Rule 51.5.14, those units are sought to also be occupied as residential use for up to 180 nights per year.

Information requested pursuant to cl23(1)(a) and (c) of the First Schedule

28. Provide an assessment of whether residential occupation of Visitor Accommodation Units for up to 180 nights per annum alters the trip-generation assumptions, traffic forecasts, intersection assessments, or infrastructure requirements contained within the transportation assessment.

Future public transport and shuttle connections

Further information is requested to better understand any considerations which have been made in the transport assessment regarding access and connections to the proposed Zone from Wānaka via public transport and private shuttle.

Information requested pursuant to cl23(1)(a) and (c) of the First Schedule

29. Confirm what consideration has been given to future private shuttle services and public transport connections between the proposed Zone and Wānaka.
30. Explain how the proposed transport network connections and development layout would support future implementation of these services.

Non-car Modes of Transport (Section 7.3)

The applicant has provided a response to Council's initial feedback (provided prior to formal lodgement of the plan change request) regarding active travel connections between the proposed Zone and Wānaka. The applicant has noted that there is sufficient room for a future trail to be constructed alongside SH6 however, however it is not proposed to be shown on the Structure Plan as it is outside the Plan Change area and (in the applicant's view) outside the scope of the plan change.

The Transport assessment also states that "It is typically accepted that people will walk a maximum of 1 km to reach a particular destination, and will cycle a maximum distance of 3 km. In this regard, there are few destinations within these travel distances"³ and "As such, it is not considered that additional infrastructure is required to be provided on the external roading networks for walking and cycling."⁴

Information requested pursuant to cl23(1)(a)-(c) of the First Schedule

31. Provide the information and reference material relied upon in support of the assumption that people will walk a maximum of 1 km and cycle a maximum of 3 km to access destinations and provide an explanation of how this assumption has considered current NZTA/Waka Kotahi guidance and research regarding walking and cycling travel behaviour, including the influence of route quality, safety, comfort, directness and connectivity on willingness to travel longer distances by active modes.
32. Provide further information regarding how the proposal provides for the future delivery of an active travel connection between the site and Wānaka.
33. Confirm whether land, corridor protection, easements or other design measures have been incorporated to ensure that a future active travel connection can be delivered and is not compromised by future development.
34. If an active travel connection to Wānaka is not proposed as part of the development, explain why this is not considered necessary and how the proposal integrates with the wider active transport network over time.

Corbridge Provisions (Document 2)

Rule 51.4 Rules-Activities Structure Plan 51.4.2

Rule 51.4.2 reserves control to (a) location and alignment; (b) surface treatment; and (c) mechanism to ensure public accessibility. The width and geometric design of the proposed walkway/cycleway should be of an appropriate standard for its intended users and compliant with relevant Council and NZTA/Waka Kotahi standards for shared paths.

Information requested pursuant to cl23(1)(a)-(c) of the First Schedule

35. Provide an explanation of why Rule 51.4.2 does not reserve control over the width and geometric design of the walkway/cycleway.
36. Alternatively, confirm width, maximum gradient and crossfall, materials and the specific route proposed for the **public walkway/cycleway** through the site, and how this provision

³ Transport Assessment (Document 11) 7.3.1 p. 22

⁴ Transport Assessment (Document 11) 7.3.2, 9.5

will be sufficient to ensure safe and efficient active travel for users. Provide any amended provisions proposed.

37. Confirm internal site provision of other paths for pedestrians, cyclists, and golf carts including widths, materials and the specific routes. Consider desire paths for workers, residents, golfers, and other visitors and the needs and safety of each type of users, or provide a proposed rule that will ensure these outcomes.

High Traffic Generating Activities Trigger (Rule 29.4.11B) and Transport Assessment (Document 11) Section 7.2

The proposed provisions include a High Traffic Generating Activities trigger of 1,050 vehicle movements per day under Rule 29.4.11B. The Transportation Assessment, particularly Section 7.2, relies on Figure 8-2 of the NZTA Planning Policy Manual (Access onto the State Highway Guide from Private Property) when assessing the form of intersection likely to be required for access to the site. The Transportation Assessment states that SH6 currently carries approximately 6,444 vehicles per day (vpd) and assesses future conditions using a design-year volume of 9,601 vpd.

Information requested pursuant to cl23(1)(a)-(c) of the First Schedule

38. Explain how the proposed Rule 29.4.11B threshold of 1,050 site-generated vehicle movements per day was derived and demonstrate how that threshold is consistent with Figure 8-2 of the NZTA Planning Policy Manual, including identification of the site traffic generation level at which auxiliary turning lanes, a right-turn bay, a roundabout, or other intersection treatment would be warranted.

Rule 27.7.34B.2 Staging and 29.4.11B (High Traffic Generating Activities)

Document 2 Draft PDP Provisions contain two separate mechanisms relating to assessment and upgrading of the SH6 intersection.

Rule 27.7.34B.2 (Staging) requires Stage 1 to provide a priority intersection with left- and right-turn auxiliary lanes and requires assessment of any upgrade requirements to the SH6 intersection at Stages 2 and 3, together with implementation of any required upgrades.

Rule 29.4.11B separately establishes a High Traffic Generating Activity framework based on a threshold of 1,050 vehicle movements per day.

Information requested pursuant to cl23(1)(a)-(c) of the First Schedule

39. Explain how these provisions are intended to operate together, including:
 - a. whether the Stage 2 and Stage 3 intersection assessments are required irrespective of traffic generation levels, or only where the threshold in Rule 29.4.11B is exceeded;
 - b. the circumstances in which each provision is intended to apply;
 - c. whether the provisions could result in different conclusions regarding the need for SH6 intersection upgrades; and
 - d. why both mechanisms are required, and how they collectively ensure timely provision of any necessary intersection upgrades.
40. Confirm whether any upgrade identified through the Stage 2 or Stage 3 assessments could be required at a traffic level lower than the 1,050 vehicle-per-day threshold specified in Rule 29.4.11B.

Rule 29.4.11B Activity Status and discretions

Rule 29.4.11B proposes a restricted discretionary activity framework for High Traffic Generating Activities and limits Council's discretion to:

- a) the efficiency and road safety effects at the site access;
- b) any functional and operational need for the activity to locate in that environment; and
- c) any recommendations arising from an assessment of traffic generation prepared by a suitably qualified and experienced traffic engineer.

Information requested pursuant to cl23(1)(a)-(c) of the First Schedule

- 41. Explain the planning and transportation rationale for limiting discretion to these matters. In particular, how the proposed rule enables consideration of wider transport effects that may arise from development within the zone, including:
 - a. integration with the existing transport network;
 - b. measures to avoid, remedy or mitigate traffic generation;
 - c. measures to facilitate mode shift and reduce reliance on private vehicle travel;
 - d. effects on the operation, safety and efficiency of the wider transport network;
 - e. cumulative transport effects arising from staged development; and
 - f. any off-site transport improvements or travel demand management measures that may be necessary to appropriately manage transport effects.
- 42. Identify why these matters are not included in the proposed matters of discretion in Rule 29.4.11B and explain how the proposed rule gives effect to the transport-related objectives and policies of the Proposed District Plan.

Three Waters Infrastructure Information Requested

The Applicant's Plan Change Request has been reviewed by the Property and Infrastructure team at QLDC to assess whether further information is required. Further information is requested regarding the Infrastructure Assessment (Document 10).

Wastewater Network Capacity

Further information is requested to better understand how adverse effects related to wastewater may be managed, as the current information does not sufficiently assist with understanding the effects of the proposal.

Information requested pursuant to cl23(1)(a) and (b) of the First Schedule

- 43. Provide wastewater network modelling that demonstrates the capacity of the downstream wastewater network and Project Pure Wastewater Treatment Plant to accommodate development enabled by the proposed Plan Change.
- 44. Identify any wastewater network upgrades required to service the proposed development, including the timing, staging, delivery and development trigger points for those upgrades.

Water Supply servicing

Further information is requested to better understand how adverse effects related to water supply may be mitigated as well as the costs and benefits of the proposal regarding water supply servicing for the proposed changes.

Information requested pursuant to cl23(1)(a) – (c) of the First Schedule

45. Confirm the preferred water supply servicing solution for the proposed development and the reasons this option has been selected over alternative servicing options.
46. Provide information demonstrating that sufficient water supply capacity, storage, pressure and firefighting capability can be provided for each stage of development.
47. Identify any infrastructure upgrades, additional storage requirements, booster infrastructure, or amendments to water take consents necessary to service the development and confirm when these would be delivered.

Landscape Information Requested

The Applicant's Plan Change Request has been reviewed by the external landscape architect to assess whether further information is required. Further information is requested regarding the applicants Landscape Assessment Report (Document 7).

Landform Visualisation Package (Document 5c) and Landscape Assessment (Document 7)

The Landscape Assessment Report (**LAR**) (Document 7) prepared by Vivian Espie relies on a series of existing photographs and 3D Landform Visualisations (along with other material) to support the landscape (including visual amenity) effects analysis. The 3D Landform Visualisations (prepared by Baxter Design Ltd) (Document 5c) have been developed in a way that does not allow a clear understanding of the following matters:

- (a) The potential visibility of built development in the Activity Areas from public places that is anticipated by the proposed plan provisions. By this it is meant that the existing 3D Landform Visualisations model development associated with the Indicative Masterplan layout, which does not form part of the plan provisions. For a plan change, it would be usual for the visualisations to clearly model:
 - the maximum development envelope anticipated by the plan provisions for each Activity Area (typically this entails projecting a building envelope up to the specified Activity Area building height, across the entire Activity Area, albeit acknowledging that the building coverage controls will deliver a reduced building footprint. This is because, building development is intended to occur anywhere within the relevant Activity Area as a controlled activity);
 - accessways;
 - the proposed LAMAs (including clear legibility of new landforms and plantings);
 - existing vegetation to be retained and protected as part of the plan change; and
 - any other proposed plantings (e.g. shelterbelts, trees/shrubs on LAMAs).

A range of RLs are proposed across many of the Activity Areas (VARs 4, 5, 6, 8, 9, 11, 12, 13, 14, 15). It is understood that the Zone Plans allow for a +/- 1m change in RL height and the building height standards are measured from the RL. The specific location where each of the RLs apply is not spatially defined in the provisions/Schedule 51.9 RL Plans (collectively

referred to as a 'variable RL approach'). It is expected that the variable RL approach will need to be revisited to allow accurate testing of potential landscape related effects (including via Visualisations) of the development outcome anticipated by the proposed provisions. For plan changes of this nature and in this sort of landscape setting, it would be standard practice to specify exactly where the proposed RLs apply on the plans and to advise specific RLs (rather than a +/- 1m change strategy).

- (b) The influence and character (appearance) of landform modification in mitigating buildings in each view, relative to the existing landform patterning character and appearance.
- (c) The extent to which golf course fairways and greens will be visible from State Highway 6.
- (d) The Activity Areas that the visible built development relates to.
- (e) The difference between existing vegetation to be retained and proposed vegetation in each view.

Information requested pursuant to cl23(1)(a) and (b) of the First Schedule

- 48. Adopt a visualisation method that aligns with landscape assessment best practice in this regard (as recommended in TTatM), using 'before and after' photographs to clearly demonstrate the potential visual change associated with the proposed plan change as experienced from SH6.

Mana Whenua

The LAR advises that the author has no specific knowledge of tangata whenua associations with the area (paragraph 30). It is understood that the requestor has sought comment from mana whenua.

Information requested pursuant to cl23(1)(a) and (d) of the First Schedule

- 49. Provide an update with respect to existing mana whenua values of relevance to a landscape assessment and an evaluation of effects with respect to those values.

Reliance on Baxter Design Documents (Indicative Masterplan)

The LAR references the Baxter Design documents (Document 5b Contextual Design Plans) in guiding their understanding of the development and the management of landscape effects. For example:

LAR para 15 (emphasis added): *The most relevant aspects of the Landscape Design Package are the Wider Context Plan (also attached as Appendix 2 to this report), the Site Context Plan (Appendix 3 to this report), the indicative Masterplan and the Typical Housing Cluster Plan.*

LAR para 16: *The Baxter Landscape Design Package Document also contains indicative plans and illustrations of the vegetative treatment of development AAs. As each AA is developed, detailed landscape design will be formulated in accordance with these indicative plans.* M9my emphasis added.)

Information requested pursuant to cl23(1)(a) and (b) of the First Schedule

50. In light of these observations, please clarify whether the landscape expert considers that the Indicative Plans (in Document 5b) should be referenced in the proposed plan provisions to deliver the landscape effects outcomes that they have concluded.
51. If not, please explain why not, noting that, for example, the requestor is not proposing location specific building controls to deliver the sort of rural built form character articulated in the Baxter Design documents such as roof pitch controls etc.

Potential Influence of Wānaka Airport on PPC provisions

Further information is sought regarding the landscape design of waterbodies in relation to the risk of bird strike due to the proximity of the Wānaka Airport to the Plan Change site.

Information requested pursuant to cl23(1)(a) and (b) of the First Schedule

52. Confirm whether a bespoke approach to planting species and the design of waterbodies (including wetlands) is required to minimise the risk of bird strike.

Existing Environment

The LAR relies, to at least some degree, on the Silverlight Studios, rural living and function venue consented development as the starting point for a landscape effects assessment (for example, see LAR paragraphs 23 and 33). It is understood that the requestor has no intention to implement the consented developments.

Information requested pursuant to cl23(1)(a) of the First Schedule

53. Clarify to what extent the LAR relies on what consents as part of the existing environment in coming to the conclusions with respect to landscape effects.

Upper Clutha Track

Further information is requested regarding the amenity effects of the proposal on users of the Upper Clutha Track.

Information requested pursuant to cl23(1)(a) of the First Schedule

54. Provide an assessment of visual amenity effects for users of the Upper Clutha Track (on the south or true right-hand side of the Clutha Mata-Au River). NB This request should be read in combination with comments with respect to Activity Area H below.

Proposed Planting

In the current proposal mitigation / enhancement planting is limited to:

- a) native shrub planting (3m to 4m high) in LAMA 6;
- b) infill planting of the existing shelterbelts in the vicinity of Maintenance AA;
- c) a western red cedar shelterbelt along part of the southwestern end of VAR 13 (noting that this appears to be incomplete in the LAMA graphics and is not keyed in on the Structure Plan);
- d) future finer grained plantings within the AAs;
- e) the Landscape and Ecology Protection areas in the Mata-au ONF; and
- f) the Ecology AA.

It would appear that, with the exception of new shelterbelt plantings, new plantings are intended to be of relatively low stature, to maintain a sense of openness. It is also understood that the proposed zone seeks to establish a cohesive landscape character. This would normally include a cohesive vegetation character.

Referencing The Hills Resort Zone, it is usual to include species lists for each planting typology to ensure the plan provisions achieve the intended landscape character effects outcome (including a cohesive landscape character). Further, if larger shrub or tree species are required in LAMA areas for mitigation purposes in relation to the development anticipated by the plan change provisions (rather than the Indicative Masterplan), that planting should be shown on the LAMA plans (as has been done for THRZ).

Information requested pursuant to cl23(1)(a) and (b) of the First Schedule

55. Please advise whether typical species lists are proposed for each potential planting typology to achieve the intended landscape character outcome, which is understood to be a cohesive and relatively low stature vegetation character to maintain a sense of rural openness?
56. Please advise whether larger shrub or tree species are required in LAMA areas for mitigation purposes in relation to the development anticipated by the plan change provisions (rather than the Indicative Masterplan)? If such planting is required, this should be shown on the LAMA plans (as has been done for THRZ).

Further Comments regarding Landscape

Following the initial review by the Council's landscape Expert the following requests have been made under Clause 23(1)(a) to better understand the nature of the Plan Change request. The following points seek clarification regarding various sections within the Proposed Plan change request.

Clarification of wording

57. Consider, relying on the LAR landscape description, if the underlined text should be inserted into provision: **51.1.4**: *"rolling moraine downlands and long range expansive rural views"*
58. Consider whether **51.2.1.13 (e)** is ambiguous and should instead read: *Ensure that the LAMA landforms are designed to blend with the existing topography.*

Provision Clarification

51.1.4 introduces/explains Landscape Values and **51.1.5** introduces/explains LAMAs.

59. Clarify if there a need to include a section explaining the intentions of the Landscape Protection Areas. **51.1.4** introduces/explains Landscape Values and **51.1.5** introduces/explains LAMAs.

51.2.1.2(d): as currently drafted, this policy conflates the differing policy tests that apply to views from the ONF (avoid) and views from the state highway (mitigate).

60. Confirm whether Policy 51.2.1.2(d) should be amended to include different policy tests that apply to views from the ONF (Avoid) and views from the State Highway (Mitigate).

51.4: does not include a section on the Landscape Protection Area

61. Confirm whether a section on the Landscape Protection Area should be included within Rule 51.4.

LAMA Plans: there is no key to identify what the red, blue and black linework relates to for plan users.

62. Confirm whether LAMA Plan's should include a key to identify what the red, blue and black linework relates to for plan users.

LAMA Plans: some LAMA plans would appear to cross reference to the Baxter Design Sketches (eg LAMA 1 plan, LAMA 3 and 6 plan). It is unclear what these references relate to and whether such material is intended to form part of the plan change provisions.

63. Clarify what LAMA plans are referencing regarding Baxter Design Sketches (in LAMA 1 plan, LAMA 3 and 6 Plan).

51.9 RL Plans: as mentioned above, the way that the RLs are indicated in the RL Plans does not make it clear as to what the anticipated RL (and consequential building height) across each specific part of an activity area is. It is expected that this will cause confusion in plan implementation.

64. Clarify the graphic approach regarding RL plans to convey where various RLs apply in an activity area.

Earthworks limit within VAR AAs: 300m³ per unit limit. It is noted that THRZ which has similarly scaled AAs in a similar moraine landscape type applies a 300m³ limit with a 500m³ limit per activity area. (NB Hogans Gully Resort Zone does not include an overall AA limit, but the HGRZ AAs are considerably smaller in scale.)

65. Amend Visitor Accommodation Activity Areas to include a 300m³ limit per unit for earthworks.

Visibility of H AA: The LAR advises that the 4m building height and 20m setback of this AA from the escarpment edge means that visibility is effectively limited to viewers 'at grade' with H AA (i.e. on the Upper Clutha terraces) on the opposite side of the Clutha Mata-Au River.

66. Please provide graphic evidence to support these conclusions, for example: Zone of Theoretical Visibility mapping, scaled cross sections etc. Particular focus should be on exploring and demonstrating potential visibility from the publicly accessible tracks on either side of the river corridor.

Roof forms standards: as mentioned above, the LAR references the Baxter Design documents (Document 5b Contextual Design Plans) in guiding their understanding of the development and the management of landscape effects. The Baxter Design documents convey a distinctly rural architectural vernacular.

67. While such an outcome is delivered in part by the exterior materials and colour standards (in particular), please advise why, from a landscape expert perspective, roof pitch controls are not considered necessary to deliver the intended and distinctly rural built design outcome that has been relied on in the assessment.

68. Please provide a version of the Structure Plan on an aerial base, and the ONF linework.

Ecology Information Requested

The Plan Change Request has been reviewed by the external ecologist to assess what further information is required related to ecology. Further information is requested regarding the Ecological Assessment (Document 6) and Infrastructure Assessment (Document 10).

Ecological Assessment (Document 6)

Section 7 (7.1 Birds, 7.2 Lizards and 7.3 Invertebrates)

Further information is requested to better understand the nature of the ecological effects of the proposed changes regarding the existing indigenous species located on site.

Information requested pursuant to cl23(1)(a) of the First Schedule

69. Provide an assessment for all indigenous species identified in the desktop study as to whether they may utilise the site (not just threatened species).
70. Provide an assessment of lizards and lizard habitat by a suitably qualified herpetologist, given that potential lizard habitats were identified.
71. Explain why the presence of *Cerius otagensis* or other Threatened or at-risk invertebrates is not proposed to be determined as part of the plan change.

Section 8 Ecological Significance Assessment

Further information is requested to better understand the ecological significance of the Plan Change Site. It is difficult to reconcile the statement *"the site is considered to have lower ecological value, with higher value in the northern portion of the site outside of the development zone"* when other parts of the site are also considered significant. Mapping the areas of ecological significance is requested to understand the effects of the proposal on the site's ecology and the areas of ecological significance. The reference to 'development zone' is unclear.

Information requested pursuant to cl23(1)(a) of the First Schedule

72. Provide clarification on whether *"the population of approximately 40 C. intertexta on the small knoll is notable within the Pisa Ecological District, because few other populations of this species of this size are known"* would meet the distinctiveness part of the rarity and distinctiveness criterion in the National Policy Statement for Indigenous Biodiversity.
73. Provide clarification on which parts of the site meet the ecological significance criteria.

Section 9 Effects of the Proposed Plan Change and Development of the Site

Further information is requested to better understand the nature of the effects of the proposed changes related to ecology on the Plan Change Site.

Information requested pursuant to cl23(1)(a) of the First Schedule

74. Explain why *"some habitat loss during works is likely unavoidable"* and other potential adverse effects on lizards are identified but *"...the overall effect is likely to be nil to positive without effects management"*.
75. Explain why removal of 14% of desert broom plants from the site is considered less than minor at the site scale and also why it would result in *"less than minor to nil"* effects on *Cerius otagensis* (if present) given this species' threat classification of 'Nationally Critical'.

Section 10 Ecological Effects Management Approach

Further information is requested to understand how any adverse effects on the area's ecology will be mitigated. It is noted that the effects management hierarchy has not been worked through as required by the NPS-IB, for example, in paragraph 10.5 of Document 6 'remediation' is used instead of offsetting to describe indigenous plantings used to manage adverse effects on lizards.

Information requested pursuant to cl23(1)(b) of the First Schedule

76. Provide more information on how adverse effects on the area's ecology will be addressed by the proposal, including how the proposed provisions will ensure adverse effects on ecology are appropriately managed. Further reporting, including management plans, and subsequent methods to address effects, including appropriate irrigation, use of herbicide sprays and weed control, would assist with mitigating effects on ecology. The proposed provisions do not currently provide an appropriate consent trigger for matters relating to effects on ecology (including the effects discussed in the Ecological Assessment) to be considered at a future consenting phase.

Infrastructure Assessment (Document 10)

Further information is requested to better understand the nature of the effects of the proposed changes regarding the Plan Change Site.

Information requested pursuant to cl23(1)(b) of the First Schedule

77. Provide an ecological assessment of the effects of excavation and shaping of the central lake and associated ponds as proposed in the Infrastructure Assessment (Patersons 20/08/2026), including how water levels, water quality and algal blooms will be managed and whether this could affect ecological values.

Yours sincerely, Nāku noa nā

Sean Cameron Widdowson