

14 July 2026

Queenstown Lakes District Council
VIA EMAIL:

Attention: Charlotte Clark

Dear Charlotte,

ARROWSOUTH PROPERTIES LIMITED - PRIVATE PLAN CHANGE REQUEST

Introduction

Southern Planning Group (**SPG**) represents Arrowsouth Properties Limited (**APL**) in relation to the proposed Private Plan Change Request (**Request**) that relates to land (**Site**) that adjoins or is located in close proximity to McDonnell Road, Arrowtown.

The Request seeks to change the current Operative District Plan (**ODP**) zoning that applies to the Site so as to enable future low density residential development within certain areas of the Site. The proposed zoning regime to be applied to the Site is the Proposed District Plan's (**PDP**) Suburban Residential Zone (**SRZ**) that resulted from the decisions of the Urban Intensification Variation (**UIV**).

The Request was formally lodged with the Council on the 9th of March 2026.

The purpose of this letter and supporting information is to formally respond to the Council's Request for Further Information (**RFI**) that was issued on the 9th of April 2026.

Specifically, this letter will address the various questions in the RFI, together with outlining the updated information and assessments for the Request. This letter will generally follow the formatting approach as contained within the RFI.

Formal Amendments to the Request

Having considered the RFI and the status of the PDP UIV for the SRZ in particular, APL have decided to make a number of amendments to the request. The formal amendments to the Request that was originally lodged with the Council are detailed below.

Zoning Approach for Non-Development Land

The Request seeks to change the zoning of the Site from the ODP Arrowtown South Special Zone (**ASSZ**) to the now PDP SRZ, so as to enable low density residential subdivision and development within a defined portion of the Site.

An overlay in the form of Building Restriction Area (**BRA**) is also proposed within the Request. A BRA is an existing standard in the PDP SRZ and the imposition of such will

avoid residential development on the affected land. The BRA is to be located on sensitive land where residential subdivision and development is considered inappropriate.

The Request originally proposed the possibility of imposing the Nature Conservation Zone (**NCZ**) from within Chapter 38 (Open Space and Recreation Zones) of the PDP as an alternative to using a BRA to avoid residential subdivision and development on certain areas of the Site.

APL has reconsidered the zoning approach for the non-developable land within the Site. This revised approach is to remove the NCZ from the Request, and as such, the full Site will be contained within the SRZ, with the BRA overlay being imposed on the sensitive areas of the Site where residential subdivision and development is to be avoided.

Minimum Lot Size of 300m²

The Request is seeking the imposition of the PDP SRZ on the Site.

The notified PDP UIV originally sought to reduce the minimum vacant net lot size in the Lower Density Suburban Residential Zone (now SRZ) from 450m² to 300m². The decisions version for the UIV SRZ has reverted to maintaining a minimum vacant net lot size of 450m² for this zone.

At the time of lodging the original Request with the Council, there was the possibility of appeals being lodged against the UIV in terms of the minimum vacant net lot size of 450m² in the SRZ. Such appeals could have sought the reintroduction of the previously proposed 300m² minimum lot size via the notified UIV.

Having reviewed the appeals lodged against the UIV, it is understood that no party is seeking the return of a blanket minimum vacant net lot size of 300m² in the SRZ. As such, the Request now deletes any reference to the potential yield of residential lots using the 300m² minimum vacant net lot size scenario.

The potential yield of residential lots using the SRZ minimum lot size requirement of 450m² is still contained in the Request. Under this scenario, it is feasible to create up to 44 residential lots within the Site.

Proposed Planning Provisions

The RFI has outlined that a bespoke Structure Plan (**SP**) for the Site might be a suitable inclusion within the Request (together with the use of the SRZ and BRA).

The reasons identified in the RFI as to why a SP might be required is to identify and require future 'actions' at the time of subdividing the Site for residential purposes via a resource consent application. In summary, these future actions are understood to be identified as follows via the RFI:

1. Transportation Considerations:

- a) Restrictions on individual private lot access directly onto McDonnell Road.
 - b) Confirming the location of internal roading (through road or cul-de-sac).
 - c) Confirming the main roading connection to McDonnell Road.
2. Future Landscaping (mitigation and amenity):
- a) The continuation of a 4.5m planting strip along the McDonnell Road frontage of the Site (excluding the main vehicular point(s) into the Site).
 - b) A new 5m planting strip running along the southern boundary of the Site.
 - c) Riparian planting along the margins of the waterbody that flows through the Site.
 - d) Fencing restrictions that deal with the following:
 - i. For residential lots that back onto the riparian corridor.
 - ii. For existing/future boundaries that face onto McDonnell Road and the southern boundary of the Site (which is also the location of the proposed relocated Urban Growth Boundary).
 - iii. For residential lots that back onto or adjoin the BRA.
3. To manage ongoing plantings, weed and rabbit control.
4. Identification of the BRA.

Having reviewed the reasons outlined in the RFI, it is not considered practical to provide a bespoke SP for the Site as an SP will be unnecessarily restrictive when subdividing the site, particularly in terms of the main vehicular access point(s) to the Site from McDonnell Road.

The justification for not including a SP within the Request is outlined below.

The original Request proposed the following bespoke policy provision within Chapter 27 (under Provision 27.3 – Location specific objectives and policies) of the PDP:

McDonnell Road – Suburban Residential Zone

Objective 27.X.X.X ***Subdivision that achieves a high quality outcome in terms of indigenous planting and riparian enhancement.***

Policy 27.X.X.X *To require native planting strips along the McDonnell Road frontage, waterbodies and along the southern boundary of the land.*

In responding to the matters raised in the RFI regarding the request for a SP, it is considered that SP is not required and instead the required 'actions' at the time of a future subdivision can be directed through a revised bespoke objective and supporting policies. As such, it is proposed to broaden the bespoke policy provisions for the Site as contained in the Request, as per below.

McDonnell Road Suburban Residential Zone

Objective 27.X.X.X *High quality low density residential subdivision and development is enabled, while appropriately providing for amenity, mitigation and riparian plantings, together with controlling access onto McDonnell Road.*

Policies

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| 27.X.X.X | <i>Require a 4.5m planting strip along the McDonnell Road frontage (excluding any primary vehicular access point(s)) and a 5m planting strip along the southern boundary of the zone.</i> |
| 27.X.X.X | <i>Maintain existing riparian planting along the waterbody that flows through the zone.</i> |
| 27.X.X.X. | <i>To provide on-going management of plantings, weed and pest control for any privately owned communal land.</i> |
| 27.X.X.X | <i>Avoid private fencing over 1.2m on boundaries of residential lots that adjoin a Council reserve containing a waterbody, the southern boundary of the zone and for any residential lot boundaries that adjoin a legal road.</i> |
| 27.X.X.X | <i>To require the identification of the Building Restriction Area at the time of subdivision within the zone.</i> |
| 27.X.X.X | <i>Avoid private vehicle crossings (and access) onto McDonnell Road from residential lots that adjoin this road.</i> |

In conjunction to the above bespoke policy, Chapter 27 (Subdivision and Development) within the PDP provides a number of existing policy provisions that deal with the matters addressed in the bespoke policy. Policy examples include:

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| Policy 27.2.1.2 | <i>Enable urban subdivision that is consistent with the QLDC Subdivision Design Guidelines 2015, recognising that good subdivision design responds to the neighbourhood context and the opportunities and constraints of the application site.</i> |
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- Policy 27.2.2.7 Promote informal surveillance for safety in urban areas through overlooking of open spaces and transport corridors from adjacent sites and dwellings and by effective lighting.*
- Policy 27.2.4.1 Incorporate existing and planned waterways and vegetation into the design of subdivision, transport corridors and open spaces where that will maintain or enhance biodiversity, riparian and amenity values.*
- Policy 27.2.4.4 Encourage initiatives to protect and enhance landscape, vegetation and indigenous biodiversity by having regard to:*
- a. whether any landscape features or vegetation are of a sufficient value that they should be retained and the proposed means of protection*
- Policy 27.2.2.5 Ensure appropriate design and amenity associated with roading, vehicle access ways, trails and trail connections, walkways and cycle ways are provided for within subdivisions by having regard to:*
- a. the location, alignment, gradients and pattern of roading, vehicle parking, service lanes, access to lots, trails, walkways and cycle ways, and their safety and efficiency;*
 - b. the number, location, provision and gradients of access ways and crossings from roads to lots for vehicles, cycles and pedestrians, and their safety and efficiency;*

Rule 27.5.7 within Chapter 27 of the PDP applies to urban subdivision. The relevant matters of discretion within Rule 27.5.7 that are relevant to the reasons raised by QLDC for proposing a SP include:

- a. subdivision design and any consequential effects on the layout of lots and on lot sizes and dimensions;*
- b. internal roading design and provision, relating to access to and service easements for future subdivision on adjoining land, and any consequential effects on the layout of lots, and on lot sizes and dimensions;*
- c. property access and roading;*
- k. open space and recreation;*
- l. ecological and natural values;*

In terms of the primary access to the Site from McDonnell Road, Chapter 29 (Transport) within the PDP provides sufficient discretion on the Council's part in terms of being able to consider all transportation and access matters during the processing of any resource consent application to subdivide the Site.

With the inclusion of the BRA on the Site, it is clear where residential subdivision and development can and cannot occur within the Site.

As part of any resource consent application to subdivide the Site, the proposed bespoke policy (together with existing PDP provisions) will provide specific attention and direction to the key matters to be addressed.

It will be appropriate to introduce an additional PDP planning map overlay to clearly articulate the land that will be subject to this bespoke policy framework (in the context of the District wide SRZ).

The revised Request now includes one Concept Subdivision Plan that indicates the maximum yield of residential lots at a minimum area of 450m² (net area). As clearly expressed in the Request, the Concept Subdivision Plan is not a formal SP, rather, this plan is a tool that not only indicates the 'maximised' residential development outcomes for the Site, but also assists with properly assessing infrastructure considerations, namely transportation and reticulated services.

If the Site is rezoned as proposed, it is unlikely that the Site will be subdivided exactly in accordance with the Concept Subdivision Plan in terms of the number of lots (and lot configuration) and access arrangements.

The Concept Subdivision Plan serves the purpose as outlined above, however, this plan does not represent the best subdivision outcome for the Site in terms of providing high quality residential lots. As such, it is considered inappropriate to lock the Concept Subdivision Plan into the PDP via a SP.

RFI Response: Site Access & Transport

The responses below considers and incorporate findings from the revised Transport Assessment (dated 7 July 2026) as prepared by Bartlett Consulting.

1(a) Confirm the available sight distance to the south out of the access;

The RFI states that the access location to the Site from McDonnell Road is 'reasonably set'. This is not a correct assumption.

There are two options available in terms of providing the primary access to the Site from McDonnell Road. These options include:

- All (or some) of the future residential lots will be served via a new intersection from McDonnell Road, or

- All of the future residential lots can be served via an extension of Brodie Avenue.

The Request does not include specific roading plans. However, from a high level analysis, the revised Transport Assessment states that the two access options listed above are feasible, with the specific traffic engineering details being addressed via a future resource consent application (which includes the engineering approval process).

The revised Transport Assessment also notes the possibility of extending the existing 40km/hr speed limit in a southerly direction along McDonnell Road. However, any extension of this speed limit will be reliant on the Council as the Road Controlling Authority.

1(b) Identify whether any shoulder widening or right turn bay would be required at this access;

The revised Transport Assessment states that no road changes are required should the existing Brodie Avenue intersection be utilised for access to all, or part, of the residential extension area.

If a future intersection is proposed with McDonnell Road within the current (rural) 80km/hr speed limit, the revised Transport Assessment concludes the following:

- Shoulder widening to accommodate a basic left turn treatment and basic right turn treatment will be required.
- Earthworks will be required for the shoulder widening to realign (vertically) the existing trail opposite the Site. It is expected that these earthworks can be accommodated within the existing 20m legal road reserve within McDonnell Road.
- The new intersection will not require additional marked lanes (right turn bay or left turn slip lane) within the McDonnell Road carriageway.

If the road speed limit is reduced to 40km/hr, then a basic urban intersection may be formed.

Again, the specific transportation details can be confirmed during the subdivision consent process.

1(c) Advise if it anticipated that the 40km/h speed limit will be extended to encompass the proposed intersection (should the Plan Change be approved);

The revised Transport Assessment has been compiled on the basis of the existing 80km/hr speed limit. While reducing the speed limit will provide a range of benefits, the matter will be decided by the Council as the Road Controlling Authority.

- 1(d) *Confirm whether the road frontage to McDonnell Road will be urbanised on the same side of the road as the site? This would include extension of the footpath to the site access.*

The revised Transport Assessment outlines the expectation that the road frontage of McDonnell Road will be urbanised in a manner that is consistent with the land to north of the site (and located on the eastern side of McDonnell Road). This urbanisation will also include the extension of the existing footpath in a southerly direction down McDonnell Road.

As stated above, restrictions via a policy framework are proposed so as to avoid individual lots accessing directly onto McDonnell Road (for those lots that adjoin McDonnell Road).

- 2 *Advise if the option of inserting a structure plan in PDP Chapter 27 is a more efficient method to provide greater certainty regarding the roading layout within the Site, and connectivity to the existing roading network (these connections are indicated on the subdivision concept plans provided with the Request but are not included in the proposed provisions). This structure plan could also identify where individual vehicle crossings off McDonnell Road and Centennial Avenue are to be restricted.*

As stated above, the purpose of the Concept Subdivision Plan is to indicate the maximum yield of residential lots, where residential development can be located (and avoided), together with confirming that future residential lots can be serviced from an infrastructure perspective.

From a roading perspective, a SP is not required to be included within Chapter 27 of the PDP. The revised Transport Assessment has confirmed that there are options available to allow access to the Site, with option that is chosen being tested and assessed via a future resource consent application to subdivide the Site.

The revised volunteered bespoke policy that will apply to the Site will provide strong guidance for subdivision through the resource consent phase, which in turn will prevent individual lots accessing directly to McDonnell Road.

RFI Response: Servicing

The response below considers and incorporates findings from the Civilised Limited Addendum dated 28 May 2028, which needs to be assessed in conjunction to the Infrastructure Feasibility Report (dated 25 February 2026) that was included in the original Request.

- 3 *Provide information demonstrating that feasible engineering solutions are available for the upgrade to the WWPS, and additional emergency storage, to service the development outcomes enabled by the proposal.*

The Addendum notes that the 300 m² minimum lot size scenario has been deleted from the Request, and this change does not affect the key infrastructure findings in the original Infrastructure Feasibility Report.

In compiling the Addendum, Civilised Limited has held discussions with the team from the Council's Property and Infrastructure team.

Based on a low pressure sewer system with the distribution of emergency storage, the Addendum confirms that there are engineering solutions available to provide for the necessary wastewater upgrade and additional emergency storage to service a future residential subdivision of the Site. These engineering solutions will be presented and assessed by the Council as part of any future resource consent to subdivide the Site.

The Addendum notes that future lot owners within the Site will need to be made aware (via a Consent Notice) of the requirement for emergency wastewater storage within their lots. Again, this matter can be addressed through a resource consent application, where a Consent Notice will enforce this requirement.

RFI Response: Landscape – Riparian Planting, McDonnell Road/UGB Treatment

This response takes on board the revised Landscape Assessment Report (**LAR**) (14 July 2026) that has been compiled by Rough Milne Mitchell Landscape Architects (**RMM**).

- 4 *Provide expert advice and technical reasons in support of the proposed 7m (5m) riparian planting widths as to achieve a meaningful ecological and landscape function/benefit and accommodate a trail.*

The Indicative Masterplan (and supporting Indicative Cross Sections) contained within the revised LAR indicates the existing and proposed landscaping within the Site.

The existing landscaping contained in the Indicative Masterplan was established via RM161093 (and subsequent resource consents) and consists of landscaping on the escarpment, along the water course, on the rocky knoll and on the McDonnell Road side of the residential lots that were approved and created via RM161093.

The proposed landscaping contained in the Indicative Masterplan is the continuation of the 4.5m roadside planting next to McDonnell Road and the 5m planting strip located on the southern boundary of the Site. These planting strips will be a requirement at the time of a future subdivision based on the revised bespoke policy provisions that are proposed to apply to the Site.

With the exception of the two planting strips mentioned above, the Indicative Masterplan is just that, an indication of the proposed landscaping outcomes for the Site. The Indicative Masterplan is not intended to form a de-facto SP that is contained within the PDP in terms of the demarcation of boundaries for residential lots.

Cross Sections A-A and B-B that accompany the Indicative Masterplan indicate 7m and 4.5m setbacks from the watercourse. The 7m setback is the water bodies building setback that is required via Rule 7.5.11 in the SRZ, while the 4.5m setback is the road

building setback via Rule 7.5.6.1 in the SRZ. The 5m 'stream planting' indicated on Cross Sections A-A and B-B is the existing planting/widths as per the requirements of RM161093.

Subject to the comments below in relation to the Overarching Open Space Management Plan (**OOSMP**) and Private Open Space Management Plan (**POSMP**) that resulted from RM161093, it is not proposed to specify exact riparian 'strips' (at either 7m or 4.5m) as part of this Request.

At the time of subdividing the Site, the Council will have the discretion via the bespoke volunteered policy provisions, existing PDP provisions (policy and rules) and the discretionary power with the required variation of Consent Notice 115852126.5 to deal with matters concerning the waterbody as per the volunteered bespoke policies listed above.

While the general protection and potential enhancement of the values associated with the waterbody are supported, the specific approach and details for this aspect of developing the Site should be addressed during a resource consent application.

5(a) Advise if the bespoke provisions referred to in the PPC Request will be amended to identify specific riparian planting width requirements (as relied on in the Landscape Assessment Report) in PDP Chapter 27 and on the plan maps or a structure plan inserted in Chapter 27; and

As outlined above, bespoke policy provisions have been enhanced in terms of the revised Request. However, it is not proposed to provide specific riparian planting width requirements within Chapter 27 of the PDP or via a bespoke SP for the Site.

5(b) Advise if bespoke provisions can identify specific planting width and performance outcome requirements in Chapter 27 and on the plan maps or on a structure plan inserted in Chapter 27 to achieve the intended landscape mitigation outcome and the technical reasons in support of any such specific planting width/performance outcomes; and

The revised bespoke policy for the Request includes the requirements for the continuation of the 4.5m planting strip along the McDonnell Road frontage, together with a 5m planting strip along the southern boundary of the zone. The revised bespoke policy will sit within Chapter 27 of the PDP. No bespoke SP is proposed.

5(c) Advise if bespoke provisions in relation to the riparian plantings will be required to achieve appropriate CPTED outcomes (along with the ecological and landscape functions/benefits alluded to above). For example, fencing controls in relation to lots backing onto the riparian corridor; and

The revised bespoke policy now includes a restriction on the height of fencing (maximum 1.2m) that adjoins the waterbody. The fencing restriction can be imposed as a Consent Notice during the future subdivision process.

5(d) *Advise if bespoke treatment should be expanded to address fencing controls along the McDonnell Road, southern boundary & Urban Growth Boundary to ensure an appropriate road frontage/rural zone interface. If so, please clarify the intended controls and how they would be incorporated into the PDP. If not, please explain why this is considered unnecessary; and*

The revised bespoke policy seeks to avoid fences over 1.2m in height for residential lots that adjoin the waterbody, the southern boundary of the Site (and the position of the proposed relocated Urban Growth Boundary) and McDonnell Road. The fencing restriction can be imposed as a Consent Notice during the future subdivision process.

5(e) *Advise if a structure plan and any accompanying rules within the SRZ Chapter 7, should be included in PDP Chapter 27, to spatially identify the Building Restriction Areas, fencing controls, and planting strips alongside the waterbody and McDonnell Road.*

As outlined above, based on the revised bespoke policy, no SP is proposed for the Site

RFI Response: Landscape - Other

The response to the landscape RFI questions are detailed below.

6(a) *Provide expert landscape comment with respect to the appropriateness of the proposed 450m² and 300m² lot size strategies and provide clear reasons in the s32 Report as to why each strategy is supported in this location, and whether one strategy is preferred over the other (again with clear reasons and evaluation against s32 tests, if that is the case); and*

As stated above, the revised Request now seeks to maintain the minimum vacant lot size requirement of 450m² for the PDP SRZ. As such, the revised LAR prepared by RMM only addresses the appropriateness of the 450m² lot size from a landscape perspective.

6(b) *Provide expert landscape advice specifically in relation to the effects of the private plan change in relation to the existing expected plan outcome of no buildings within the POS-P2 and POS-P3 parts of the site; and*

It is assumed that the reference to ASSZ POS-P2 is incorrect as the land affected by POS-P2 is located outside of the Site that is subject to this request.

There are two distinct areas of land contained within the ASSZ POS-P3 Site, located above and below. Rule 12.32.3.6(iii) within the ASSZ states that it is Prohibited Activity erect any buildings within POS-P3.

With the imposition of the BRA on the Site, together with no buildings on the waterbody, the Request largely seeks to allow residential subdivision and development within the POS-P3 via the SRZ.

Removing future residential development from the POS-P3 is an academic question, because this outcome leads to no further residential development on the Site (and the need for this Request). In effect the status quo will remain for this part of the Site. As such, it is considered that landscape evidence is not required to respond to this question.

6(c) Clarify what is proposed in regard to adhering to the Arrowtown Design Guidelines; and

Prior to the release of the PDP UIV decisions, the Site was contained in the Lower Density Suburban Residential Zone (**LDSRZ**). Objective 7.2.4 within the LDSRZ sought that residential development in Arrowtown should be compatible with the town's existing character. In this regard, Policy 7.2.4.1 in the LDSRZ stated the following:

Ensure development, including infill housing, community housing and commercial development is of a form that is compatible with the existing character of Arrowtown, guided by the Arrowtown Design Guidelines 2016, with particular regard given to:

a. building design and form;

b. scale, layout and relationship of buildings to the street frontage(s);

c. materials and landscape response(s)

The UIV decision for the SRZ has removed the reference to the Arrowtown Design Guidelines 2026 (**ADG**). However, the Arrowtown Village Association has lodged an appeal which seeks the reinstatement of the ADG for the SRZ in Arrowtown. It is noted that the ADG still applies to the Arrowtown Town Centre Zone and Arrowtown Residential Historic Management Zone.

On the assumption that the ADG's are reimposed in the SRZ in Arrowtown, then any residential development on the Site will be subject to the ADG and in particular Policy 7.2.4.1. This outcome will be the same for any other residential development in the broader SRZ in Arrowtown.

It is noted that for any subdivision of the Site under the SRZ, Chapter 27 within the PDP requires the application of the Council Subdivision Design Guidelines 2015 via Policy 27.2.1.2.

6(d) Provide commentary with respect to potential cumulative effects from a landscape perspective, in light of Private Plan Change 1 – The Hills Resort Zone.

RMM have addressed this question in the revised LAR. While The Hills Resort Zone plan change and the Site are located within the broader McDonnell Road visual catchment, they are visually and spatially separated and are unlikely to be perceived as a single or continuous pattern of development. For these reasons, RMM consider that adverse cumulative landscape and visual effects experienced from within the

McDonnell Road catchment are anticipated to be very low when the two private plan changes are combined from a landscape perspective.

6(e) Provide commentary with respect to the potential adverse visual amenity effects in relation to rural living and residential properties on McDonnell Road in the vicinity of the plan change land; and

RMM have addressed the potential adverse visual amenity effects in terms of the existing residential lots within the Site (and to the north of these lots, outside of the Site), the land to the west and south of McDonnell Road.

7(a) Advise any zoning/overlay preferences for the proposed BRA areas in this regard from an expert landscape perspective, including clear reasoning; and

As outlined above, the Request originally proposed the possibility of imposing the NCZ from within Chapter 38 of the PDP as an alternative to using a BRA to avoid residential subdivision and development on certain areas of the Site.

This revised approach is to remove the NCZ from the Request, and as such, the full Site will be contained within the SRZ, with the BRA overlay being imposed on the sensitive areas of the Site where residential subdivision and development is to be avoided.

A BRA is an existing standard in the PDP SRZ and the imposition of such will avoid residential development on the affected land.

7(b) Advise whether a bespoke treatment should be expanded to address fencing controls adjacent BRA (or NCZ areas) to ensure an appropriate interface with McDonnell Road. If so, please clarify the intended controls and how they would be incorporated into the proposed provisions. If not, please explain why this is considered unnecessary. Again, please consider the use of a structure plan to be incorporated into Chapter 27.

The revised bespoke policy addresses future fencing controls within the Site. No additional controls or SP are required to implement the future fencing restrictions.

RFI Response: Ecology

The response to the ecology RFI questions are detailed below.

8(a) Provide a statement from a suitably qualified and experienced ecologist which confirms whether the proposed 7-metre setback for a residential development from the waterway is appropriate to prevent any ecological degradation to it; and

As stated above, it is not proposed to specify exact riparian 'strips' (at either 7m or 4.5m) as part of this Request.

The general protection and potential enhancement of the values associated with the waterbody are supported, however, the specific approach and details for this aspect

of developing the Site should be addressed during a resource consent application. As outlined previously, at the time of subdividing the Site, the Council will have the discretion via the bespoke volunteered policy provisions (as detailed above), existing PDP provisions (policy and rules) and the discretionary power with the required variation of Consent Notice 115852126.5 to deal with matters concerning the waterbody. There is also the matter of the SRZ building setbacks as contained within Rules 7.5.6.1 and 7.5.11.

The Council will also have the discretion to require an ecological assessment at the time of subdivision, with such an assessment considering the specific details of the subdivision application and any potential effects (including positive) on the waterbody.

8(b) Provide a statement from a suitably qualified and experienced ecologist which confirms what would be appropriate plantings for the proposed dry basins to manage stormwater run-off.

The level of detail included in this question is more appropriately addressed during the assessment of a resource consent that seeks to subdivide the site.

The purpose of the Infrastructure Feasibility Report (IFR) contained in the original Request is to confirm that it is feasible to service a future residential subdivision. From a stormwater disposal perspective, the IFR outlines the solutions that can be used to manage and dispose of stormwater, therefore, it is feasible to manage stormwater from a residential subdivision on the Site.

Stormwater modelling and the designing and implementation of physical works to manage stormwater are based on a specific subdivision layout (roading and lots). The Subdivision Concept Plan contained in the Request will not be the exact subdivision plan for any future resource consent application to subdivide the Site. A different subdivision approach will entail a range of detailed assessments at subdivision stage, including for stormwater. While it is likely that some form of dry basins will be needed for stormwater basins, such may be of a different size and location than what is indicated in the IFR – based on an alternative subdivision approach when compared to the Subdivision Concept Plan.

Further, if a future stormwater dry basin is to be vested in Council ownership, our understanding via the Parks and Reserves Department of Council, is that planting within the dry basin is not acceptable to the Council. This on the basis that the Council does not want the on-going management costs for maintaining planting within a stormwater dry basin.

Stormwater management will be a key consideration during any future resource consent application. During this process, the Council will have the discretion to require ecological enhancements where possible and practical for stormwater management.

9(a) If the 7-metre setback is confirmed to not be appropriate by a suitably qualified ecologist, then provide a suitable solution to address this matter; and

It is not proposed to specify exact riparian 'strips' (at either 7m or 4.5m) as part of this Request. Providing a 'suitable solution' via this Request will be akin to providing the specific details that accompany a resource consent application to subdivide the Site.

9(b) Advise if the Open Space Management Plan (OOSMP) and Private Open Space Management Plan (POSMP) will be updated to reflect the recommendations outlined within the Ecological Assessment of Indigenous Plantings provided by Natural Solutions for Nature Ltd; and

The OOSM and POSMP were created via the resource consent RM161093 (and subsequent consents). The on-going requirements for the OOSM and POSMP are governed by Consent Notice 11585126.5.

Lane Neave have drafted a Memorandum (dated 14 May 2026) that addresses the variation of Consent Notices under the Resource Management Act 1991 (**RMA**). The Memorandum (contained within the revised Request) confirms that there is no statutory ability to vary a Consent Notice via a plan change process.

Consent Notice 11585126.5 will need to be varied as part of subdividing the site under the SRZ. As part of this process, the recommendations contained in the Natural Solutions for Nature Limited report can be incorporated into the subdivision process and Consent Notice variation via section 221 of the RMA.

Based on the above reasons, the OOSM and POSMP will not be updated at this point.

9(c) Advise if the OOSMP and POSMP will be updated to reflect the recommended Maintenance Activities for the two proposed dry basins outlined within Section 7.3 of the Stormwater Feasibility Report (included within the Infrastructure Feasibility Report, Appendix N), and if the design and plantings recommended by a suitably qualified ecologist will be included.

As outlined above, the OOSM and POSMP cannot be updated as part of the Request. Despite this, it is not considered appropriate to update the OOSM and POSMP (via a resource consent application) to accommodate the two dry water basins, which inevitably will not be exactly the same to what is proposed for stormwater when the Site is subdivided for residential purposes under the SRZ.

Based on the above reasons, the OOSM and POSMP will not be updated at this point.

RFI Response: Landscape & Ecology – POOSMP & OOSMP

The response to the ecology RFI questions are detailed below.

10(a) Provide reasoning as to why it has not been proposed that the POOSMP and OOSMP are directly referenced within the proposed provisions and why it was deemed to be more appropriate to vary the existing consent notice 11585126.5; and/or

The OOSM and POSMP (secured via Consent Notice 11585126.5) were created under the ODP ASSZ. The proposed SRZ for the Site represents a very different proposition for the land that could be subdivided and developed for residential purposes when compared to the ASSZ. On the assumption that the Site is rezoned to the SRZ, it is considered inappropriate that the current OOSM and POSMP are incorporated into new provisions in the PDP, especially when these documents will need to be varied in order to enable the subdivision of the Site.

The appropriate (and standard) course of action will be to vary the OOSM and POSMP (via section 221 of the RMA) as part of a resource consent application to subdivide the Site under the SRZ. This approach will enable a full consideration of the specific subdivision approach, which in part will include dealing with the aspects of the OOSM and POSMP that will remain, together with either new and/or enhanced provisions.

Alternatively, there is the potential that the land not being developed for residential purposes is vested in Council ownership. If this outcome eventuates, a different on-going land management approach will need to be adopted.

Overall, the appropriate outcome is to create a management approach for the non-developable land (assuming no vesting occurs) that accurately reflects the residential land that is subdivided under the SRZ as opposed to incorporating partially outdated documents in the form of the OOSM and POSMP into the provisions.

10(b) Alternatively, advise if it would be more appropriate to use a structure plan within Chapter 27 and associated rules to manage the ongoing plantings, weed control and rabbit control for the area, instead of reference to the POOSMP and OOSMP within the plan or a variation to the existing consent notice 11585126.5.

Irrespective of this Request, the POOSMP and OOSMP both outline the on-going management of the land subject to these documents in terms of ongoing plantings, weed control and rabbit control.

As stated above, it is considered that the current POOSMP and OOSMP should not be incorporated into the Request. Further, neither a SP or specific new rules are required to deal with ongoing plantings, weed control and rabbit control. These matters can and should be dealt with via the future resource consent process.

RFI Response: Urban Design

The response to the urban design RFI question is detailed below.

11. *Please provide further detail on the interface between the proposed built form and the waterway identified as Private Open Space Waterway 1 (POS-W1) in the current ASSZ Structure Plan (Chapter 12, ODP). In particular, further clarification is sought on how Crime Prevention Through Environmental Design (CPTED) principles have been integrated and applied along the northern and southern edges of the waterway in the proposal.*

The revised Urban Design Assessment (**UDA**) (dated 22 June 2026) states that the subdivision layout (lots, access, reserves) and resulting edges to the waterway will be determined during the subdivision consenting process. During the consenting process, existing PDP provisions and the proposed bespoke policy framework will ensure a successful integration between future residential built form and the waterbody. Aside from the existing SRZ building setback from a waterbody, the primary CPTED method will be the restriction of fence heights for residential lot boundaries that adjoin the waterbody.

RFI Response: Section 32 Evaluation

The response to the Section 32 Report RFI questions are detailed below, with the Section 32 Evaluation being updated to deal with these questions.

12 *In consideration of the above information, please provide the below information in an updated s32 Report:*

- a. *Objectives that do not refer to specific methods; and rather that describe the resource management outcomes sought by the PPC; and*

Section 2.2 of the revised Section 32 Evaluation outlines the broad objectives of the Request. The Request outlines the objectives are rezoning the land to accommodate low density residential development, restricting such development within certain areas of the Site, and moving the ODP/PDP UGB.

- b. *Within the options analysis, please provide an assessment against alternative residential zoning under the PDP; and*

Section 2.3 of the revised Section 32 Evaluation now includes the option of rezoning the Site to the Medium Density Residential Zone.

- c. *Evaluate why the NCZ subzone was deemed to be the most appropriate alternative to the BRA out of the four sub-zones listed in Chapter 38 of the PDP; and*

The NCZ option has been removed from the Request. The land within the Site that cannot be developed for residential purposes will be contained within a BRA.

- d. *Please outline how the areas with the BRA can be guaranteed for public access if they are kept in private ownership and can be easily accessible and desirable for the use by the local community; and*

Notwithstanding the existing trail that is protected by a right of way easement (pedestrian) over Lot 103 DP 535793, the purpose of the proposed BRA's is to avoid residential development as opposed to providing further and/or new public access.

However, during a future resource consent process to subdivide the Site, it is possible that the proposed BRA land could be vested in Council ownership, thereby providing for public access. Alternatively, if the BRA land is to remain in private ownership,

easements in favour of the Council for public access could also be imposed/volunteered during the subdivision process. As such, it is not proposed to specifically address public access via the BRA's in a policy context for the Request.

- e. Please update the S32 report for the "Risks of Acting" to include infrastructure considerations and any other potential risks; and*

Section 3 in the revised Section 32 Evaluation has been updated to deal with the required reticulated wastewater network upgrade.

- f. Please update the s32 Report to include an assessment of all bespoke provisions, including a marked-up version of all relevant PDP Chapters sought by the proposal; and*

Section 5 within the revised 32 Evaluation provides an assessment of the bespoke policy provisions to be inserted into Chapter 27 of the PDP. As this is the only PDP 'text' change, a marked-up version of the subject PDP chapter has not been provided.

- g. Provide a more fulsome evaluation of why the current ASSZ provisions in their entirety are a less appropriate option, and whether any current ASSZ provisions should be incorporated into bespoke provisions; and*

Section 5 in the revised Section 32 Evaluation has addressed this question.

- h. Provide an evaluation against the current Operative Regional Policy Statement; and*

Section 6 in the revised Section 32 Evaluation has addressed this question.

- i. Please amend the s32 to include a summary of the consultation undertaken; and*

Section 1.2 in the revised Section 32 Evaluation has addressed this question in terms of the consultation undertaken to date by APL.

- j. Please update the s32 to respond to any changes proposed by the requestor, in response to the RFIs set out in (1) to (7) above.*

See the above responses and revised Section 32 Evaluation.

RFI Response: Affordable Housing

The response to the affordable housing RFI question is detailed below.

- 13 *Please provide information regarding affordable housing outcomes, including regarding contributions of land or money to the Queenstown Lakes Community Housing Trust.*

Following receipt of the RFI, APL have been in direct discussions with the Queenstown Lakes Community Housing Trust (**QLCHT**). APL have proposed a financial contribution direct to the QLCHT, with such contribution being handled via a private agreement between APL and the QLCHT. Discussions are on-going and the Council will be kept informed of any agreement that is reached between the parties.

Should you have any questions in relation to this letter please give me a call.

Yours Sincerely

A handwritten signature in black ink, appearing to be 'S. Freeman'.

Scott Freeman

DIRECTOR

SOUTHERN PLANNING GROUP