

15 January 2026

Sean Widdowson  
Policy Planner  
Queenstown Lakes District Council

Email: [sean.widdowson@qldc.govt.nz](mailto:sean.widdowson@qldc.govt.nz)

Dear Sean,

**RE: THE HILLS RESORT ZONE – PRIVATE PLAN CHANGE – SUBMISSION NO. 13 (JAMES & JANENE DRAPER)**

The Hills Resort Limited (**THRL**) has been engaging with James and Janene Draper regarding their submission on The Hills Resort Zone (**THRZ**) – Private Plan Change 1 (**PC1**). The Draper’s submission is at **Attachment A**.

As a result of the discussions, THRL has agreed to modifications to THRZ provisions in relation to the ground level RL and building heights on House Sites 9, 10, 11 and 16; and the role of the new access road into the from Hogans Gully Road. These modifications are discussed as follows.

**House Sites 9, 10, 11 and 16**

The RL and maximum building heights for House Sites 9, 10, 11 and 16 are reduced by 1m. This is shown in the modifications to the proposed PC1 updates to Rule 47.5.3 as follows (the notified updates are in red and the new changes as a result of the discussions with the Drapers are in blue):

	Standards – The Hills Resort Zone	Non-compliance status
...		
	<b>Buildings</b>	
47.5.3	<p><b>Maximum Height - all Activity Areas except Activity Areas 4 and 5</b></p> <p>No building shall protrude through the RL listed below and shall be no higher than the height listed below:</p> <p>a. Activity Area A1 RL<del>418.54</del><u>22.0</u> masl — 8m</p> <p>b. <u>Activity Area A1.b RL424.0 masl — 6m</u></p> <p>c. Activity Area A2 RL416masl — 8m</p> <p>d. Activity Area A3 RL421 masl — 8m</p> <p>e. Activity Area A6 RL419.5 masl — <u>8</u>10m</p> <p><del>f. Activity Area A7 RL414 masl — 8m</del></p> <p>g. Activity Area A8 RL402.5 masl — 6.7m</p> <p>h. Activity Area A9 RL417.5 masl — 8m</p> <p>i. Activity Area 10 RL<del>406.54</del><u>10.5</u> masl — <u>6</u>8m</p>	NC

<p>j. Activity Area 11 RL<del>408.5</del><u>410.0</u> masl — 8m</p> <p>k. Activity Area HS1 RL419.0 masl — 8m <del>masl</del></p> <p>l. Activity Area HS2 RL421.5 masl — 8m</p> <p>m. Activity Area HS3 RL415 masl — 6.5m</p> <p>n. Activity Area HS4 RL408 masl — 8m</p> <p>o. Activity Area HS5 RL437.5 masl — 5.5m</p> <p>p. <u>Activity Area HS6 RL436.5 masl – 6.5m</u></p> <p>q. <u>Activity Area HS7 RL430.5 masl – 6.5m</u></p> <p>r. <u>Activity Area HS8 RL432.5 masl – 6.5m</u></p> <p>s. <u>Activity Area HS9 RL40<del>21.5</del> masl – <del>65.5m</del></u></p> <p>t. <u>Activity Area HS10 RL40<del>54.5</del> masl – <del>65.5m</del></u></p> <p>u. <u>Activity Area HS11 RL424<del>198.25</del> masl – <del>65.5m</del></u></p> <p>v. <u>Activity Area HS12 RL410.5 masl – 6.5m</u></p> <p>w. <u>Activity Area HS13 RL417.0 masl – 6.5m</u></p> <p>x. <u>Activity Area HS14 RL411.5 masl – 6.5m</u></p> <p>y. <u>Activity Area HS15 RL377.5 masl – 6.5m</u></p> <p>z. <u>Activity Area HS16 RL41<del>65.5</del>masl – <del>65.5m</del></u></p> <p>aa. Activity Area C RL425.0 masl — 8m</p> <p><del>bb. Activity Area DR RL412.5 masl — 5.5m</del></p> <p>cc. <u>Activity Area GTF RL416.5 masl – 6.5m</u></p> <p>dd. Activity Area S1 RL408.5 masl — 7m</p> <p>ee. Activity Area S2 RL411 masl — 7m</p> <p>ff. <u>Activity Area SGG RL406.0 masl - 7m</u></p> <p>gg. Filming towers 12m</p> <p>hh. All other buildings and structures (except in Activity Areas A1-A9) (except outdoor art installations) 5.5m</p> <p>Note: RL is masl</p> <p>Note: The building heights are rolling heights and shall be measured from existing ground level. Where a RL limit and building height limit are specified, the lower limit shall apply.</p>	
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THRL formally adopts these new RL and height limits for House Sites 9, 10, 11 and 16.

**Access road from Hogans Gully Road**

The Drapers seek that the new access road into THRZ is not to be used as a through-road for traffic generally into and out of the resort. This is not the purpose, but to ensure this, THRL proposes a new standard (Rule 47.5.23) as follows, in blue:

	<b>Other Activities</b>	
...		
<u>47.5.23</u>	<u>Use of eastern access road from Hogans Gully Road</u>	<u>NC</u>

	<a href="#">The eastern access from Hogans Gully Road shall provide access to House Sites 9 – 16 only and shall not be used as a through-road for vehicles from other parts of the Zone</a>	
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Note that this does not preclude internal connections for golf carts and service vehicles accessing the House Sites from other parts of the resort.

The Drapers have agreed with THRL to withdraw their submission on this basis. They will engage directly with the Council in that regard.

Could you please confirm acknowledgment of the updates to Rule 47.5.3 and we respectfully request that the updated rules are reflected in your assessment and s42A reporting.

Also for your information, we are engaging with other submitters and will update you on progress as soon as possible.

Please feel free to get in touch if you have any questions on this matter.

Yours sincerely,



**Caleb Tien**  
**Brown & Company Planning Group**

**ATTACHMENT**

- A. Submission No. 13: James & Janene Draper

**FORM 5****SUBMISSION ON A PLAN CHANGE TO THE PROPOSED  
QUEENSTOWN LAKES DISTRICT PLAN**

Clause 6 of Schedule 1 of the Resource Management Act 1991

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**TO:** QUEENSTOWN LAKES DISTRICT COUNCIL

**FROM:** JANENE & JAMES DRAPER

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**1. INTRODUCTION:**

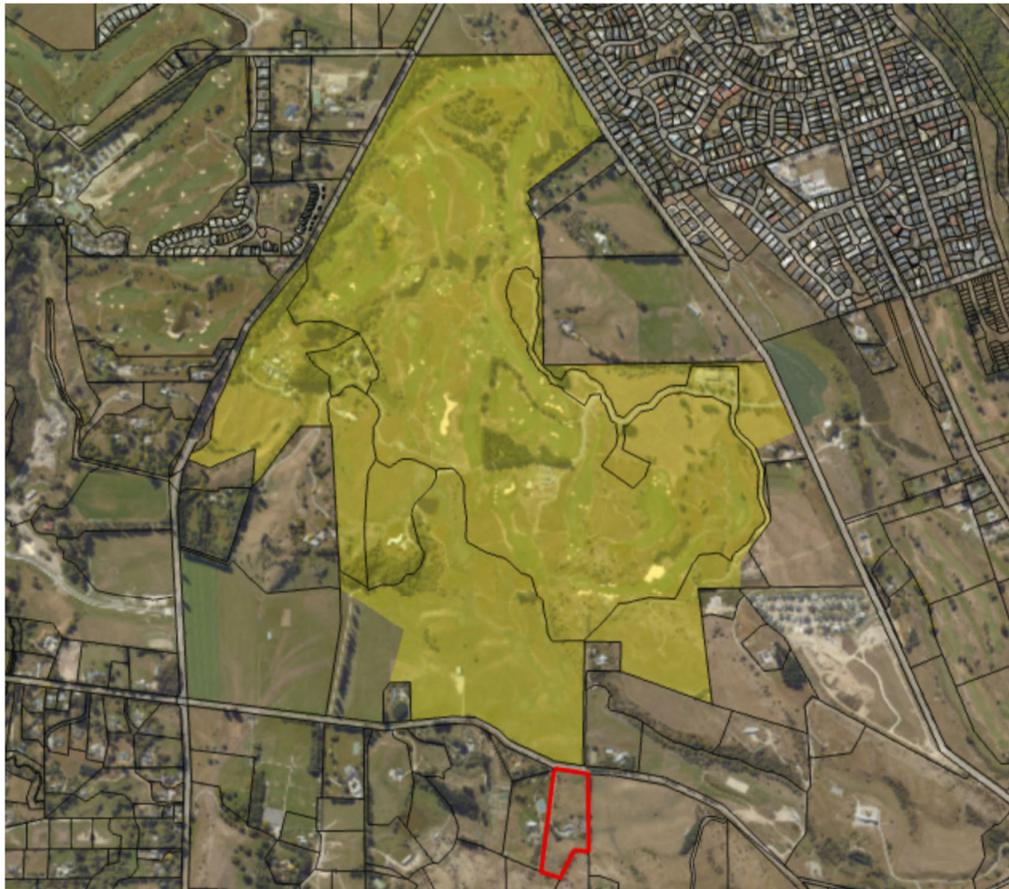
- 1.1. This is a submission by Janene and James Draper on Private Plan Change 1 (“**PC1**”) requested to the Proposed Queenstown Lakes District Plan (“**PDP**”) by The Hills Resort Limited.
- 1.2. We own a residential property at 110 Hogans Gully Road.
- 1.3. We are directly affected by an effect the subject matter of this submission and could not gain an advantage in trade competition through this submission.
- 1.4. Our submission opposes the addition of eleven new homesites to ‘The Hills Resort Zone’ (“**THRZ**”) as notified as we do not believe that the plan change request application and supporting documentation provide an accurate or robust assessment of the potential effects on our property. We reserve our position further pending information or assessment that may adequately address the concerns raised in our submission.

**2. BACKGROUND & CONTEXT:**

- 2.1. Our property 110 Hogans Gully Road (Lot 1 Deposited Plan 305713 held in Record of Title 22836) is located immediately opposite and to the south of the THRZ.
- 2.2. We purchased our property on 29 October 2021, being immediately drawn to the section for its privacy, rural amenity values, and outlook. Until very recently, when we were notified about this plan change by the council, it was our understanding that while further development of the Hills Resort Zone was anticipated, in accordance with the approved structure plan, only five residential home sites had been approved within the zone, four of which already contain existing dwellings.
- 2.3. We have also only recently become aware of the previous resource consents granted for THRZ which approved subdivision and building platforms including on

land to the south of the zone that may have been visible from our property. The relevance of these consents is discussed further in **Section 4** of our submission.

- 2.4. In August 2024, we completed the construction of a new residential unit to replace the previous dwelling. The resource consent process for our new dwelling, detached residential flat, and storage shed was extensive. It required the erection of height poles, the preparation and peer review of a landscape and visibility assessment, detailed assessments of proposed access, servicing and infrastructure and resolution of a substantial number of RFI points and draft consent conditions.
- 2.5. Our house is single-level and positioned on an elevated terrace to the south of Hogans Gully Road and orientated north to maximise sunshine and views towards Mount Beetham, Mount Soho and the Crown Terrace. The proposed cladding and materials are natural and recessive, with landscaping and planting (including mounding) designed to limit any views into our property.
- 2.6. **Figure 1** shows the location of our property in relation to the Hills Resort Zone, subject to PC1 while **Figure 2** illustrates our existing views north towards THRZ and beyond.



**Figure 1:** Submitters property located at 110 Hogans Gully Road (red outline) in relation to Hills Resort Zone (shaded yellow)



**Figure 2:** Submitters existing view towards THRZ (photo taken on 17 August 2025).

### **3. REASONS FOR SUBMISSION - KEY CONCERNS RELATING TO THE ADDITIONAL NEW ELEVEN HOMESITES:**

#### **Absence of Robust Landscape and Visual Assessment:**

- 3.1. The requested plan change to the PDP will increase the number of homesites within the THRZ from 5 to 16. The addition of eleven new home sites includes homesites positioned to the south of the zone and orientated towards our property, the wider Hogans Gully Road and north Lake Hayes residential catchment.
- 3.2. Despite our existing views towards THRZ and beyond being largely devoid of residential development (as shown in **Figure 2**), the AEE submitted in support of the plan change states (emphasis added):

*“The new HS have been located in parts of the terrain where they can be absorbed. Even where low-moderate visual effects may be experienced from some elevated private viewpoints on the southern side of Hogans Gully Road, the landscape character would be maintained as the escarpment in this location already contains a number of private residences both within and outside of the zone. The existing development pattern would be continued with a predominance of open space and only partial visibility of buildings set within the varied topography” (page 7, AEE).*

- 3.3. The applicant’s landscape assessment further concludes that:

*“views to HS 9–10 would only be glimpsed at most with low visual effects.”*

- 3.4. With respect to HS9 – 14 and 16, Table 1 of the AEE provides an overview of visual effects resulting from the changes and includes the following of relevance to our property (emphasis added):

*Visibility: Barely visible from public viewpoints in the Hogan Gully/ Arrowtown-Lake Hayes Road catchment due to their elevated nature where the intervening terrain curtails views from below, but there may be glimpsed views of the rooflines of some buildings above the screening landforms and vegetation....*

*Visual effect: Low for HS 9-10. Low-moderate for HS11-14 and HS16 from sections of Hogans Gully Road with partial views to the proposed buildings from viewpoints between the Arrowtown Lake Hayes Road intersection and the proposed turn-off near HS 15, and ranging from very low to low-moderate from the residences at 58-110 Hogans Gully Road, depending on the orientation of their outlook and building location within the terrain/ vegetation.*

- 3.5. The key conclusion of the visual assessment included in the AEE is that most activity area and homesite changes will result in effects ranging from ‘very low’ to ‘low’, with only HS11–14 and HS16 potentially reaching the level of ‘low–moderate’ due to partial views from Hogans Gully Road and some elevated private viewpoints on the southern side of the road. These potential effects are downplayed by the assertion that they will be largely internalised within THRZ, with only limited and partial visibility from outside the zone (i.e., Hogans Gully Road).
- 3.6. The assessment from ‘viewpoint 8’ (108 Hogans Gully Road) provided in the Landscape Assessment by Boffa Miskel is most relevant to understanding potential views on our property. In this assessment, Boffa Miskel (contrary to the AEE as per our comment in para 3.3) note that:

*“no new built form would be visible under the approved structure plan. Existing buildings on properties neighbouring THRZ can also not be seen”.*

- 3.7. In terms of potential changes to views and potential visibility if the plan change proposal is implemented, Boffa Miskell state the following (emphasis added):

*Glimpsed views to proposed Homesites 9, 10, 11, 13 and 16 would be theoretically possible from this viewpoint. However, the proposed landform shaping within the associated LAMAs would almost fully screen these views.*

- 3.8. We find the above statements and conclusions about potential visibility effects of the additional eleven homesites proposed inadequate for the following reasons:
- To date, no profile poles have been erected to illustrate the potential visibility of any of the new homesites. It is therefore unclear how the landscape architect can provide confident statements regarding potential visual effects without certainty about actual views. While we acknowledge that this is a plan change request rather than a resource consent process, we question why the applicant has not been required to provide profile poles. QLDC typically requires such an assessment for a new dwelling within the adjoining Wakatipu Basin Rural Amenity Zone, including when the dwelling is proposed within an approved residential building platform in order to adequately demonstrate potential visual effects.

- While Boffa Miskell has completed visual simulations from various vantage points along Hogans Gully Road, including 108 Hogans Gully Road (VS8A, VS8B and VS8C), the visual simulation (refer to **Figure 3**) has been taken from a very low point on Hogans Gully Road - essentially in a dip and adjacent to the southern boundary of THRZ. This viewpoint does not reflect potential private views from elevated properties to the south, such as ours, where visibility effects may be greater due to our property being at a significantly higher level (as shown on **Figure 2**).
- The report's conclusion that "glimpsed views to proposed Homesites 9, 10, 11, 13, and 16 would be theoretically possible from this viewpoint" and that "the proposed landform shaping within the associated LAMAs would almost fully screen these views" is vague. Without accurate visualisation tools, such as profile poles or additional simulations from higher vantage points, the degree of screening cannot be reliably determined and may underestimate the actual visibility effects.
- Overall, the current assessment provides an incomplete and potentially misleading picture of the visual effects. Until proper visualisation methods are undertaken, any conclusions regarding the visibility of the proposed homesites cannot be considered robust or reliable, and the true impact on surrounding properties is uncertain.



Figure 2



**Figure 3:** Existing views from (a) Submitters Property at 110 Hogans Gully Road compared to VS8B and VS8C provided by Boffa Miskell from 108 Hogans Gully Road

### **Scale and Density Proposed**

- 3.9. In our view, the scale and focus on residential development goes beyond what would reasonably be considered ancillary to the Hills Golf Resort and more closely resembles a new housing subdivision than an integrated component of the resort. While we acknowledge that THRZ provides for a greater level of residential activity overall, the location and visibility of the proposed homesites within the Hogans Gully visual catchment contrasts with the approach taken in the surrounding Wakatipu Basin Rural Amenity Zone, where residential density is typically limited to one dwelling per site and carefully managed to protect rural character and amenity values.
- 3.10. It is our view that the density and location of the proposed homesites and access way located on the southern portion of THRZ has the potential to degrade our rural amenity by reducing our visual access to open space, spaciousness, and privacy.
- 3.11. Although ecological restoration via Landscape Amenity Areas (LAMAs) and Structural Planting Areas (SPAs) may eventually provide a degree of screening and a more natural context, we anticipate that the dwellings may remain visible from our elevated vantage point. By comparison, the number and prominence of homesites in the proposed plan change will increase the perception of a residential subdivision across the landscape, reducing the predominance of open space that currently characterises THRZ.
- 3.12. We also note that the creation of a new vehicle access point to the THRZ from Hogans Gully Road will serve Homesites 9–16. The introduction of this secondary access, servicing almost half of the residential sites within the zone, further reinforces the impression that these homesites function as a separate subdivision rather than as an integrated element of THRZ. Unlike the existing resort-related activities, which are internally accessed and connected to the core golfing facilities, this new access will serve primarily residential purposes.
- 3.13. While residential visitor accommodation and homestays have always been permitted activities within the THRZ, the proposed addition of eleven new homesites will significantly increase the potential effects of these activities on our rural amenity. Higher occupancy and activity across more dwellings will result in increased noise, traffic, and domestic activity, particularly given the proximity of the new accessway off Hogans Gully Road and neighbouring properties. Combined with the visibility of the new homesites, these factors are likely to further reduce the sense of privacy, tranquillity, and openness that currently characterises the Hogans Gully environment.

### **Inconsistency with THRZ Provisions of the PDP:**

- 3.14. The additional homesites may not fully align with the overall purpose of THRZ (47.1.1) which includes (emphasis added):

*“Buildings are integrated with the surrounding landform and planting, so that they are visually discrete. In some areas landscaping is required to mitigate the potential adverse effects of built development on landscape character”.*

- 3.15. The proposed plan change may also be inconsistent with the Activity Areas description, which states (emphasis added):

*“The Hills Resort Zone Structure Plan, and associated standards for buildings and landscaping, ensure that built development is appropriately located and well-integrated with the golf courses and other on-site visitor activities, and the local and wider landscape setting”.*

- 3.16. In terms of Objectives and Policies of THRZ, the development is likely to be inconsistent with the following provisions (emphasis added):

*47.2.1 Objective — An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located and designed with particular regard to maintaining the landscape character and amenity values of the Zone and surrounding environment.*

*Landscape and Amenity (47.2.1.14): Maintain the landscape character and visual amenity values of the Zone, including the values described in 47.1.3, by c. Ensuring that buildings are located only in areas where the change can be absorbed and so that a predominance of open space is achieved across the Zone.*

*Buildings (47.2.1.15): Avoid or mitigate adverse visual effects of development and associated infrastructure within and beyond the Zone through controls on building height, light spill, external appearance, coverage and landscaping requirements.*

- 3.17. While there remains some uncertainty due to the absence of height poles and a comprehensive landscape and visibility assessment, it is anticipated that at least some of the proposed new homesites are likely to be inconsistent with these provisions, as they are expected to be somewhat visible from a number of surrounding elevated properties on Hogans Gully Road, including ours.

### **Plan Change Process**

- 3.18. The absence of profile poles, combined with reliance on simulations that do not accurately represent actual views from neighbouring properties on Hogans Gully Road, sets a concerning precedent. It suggests that large-scale residential developments, such as the addition of eleven homesites with building platforms ranging from 1,250m<sup>2</sup> to 3,000m<sup>2</sup> could potentially advance through a private plan change with less supporting evidence than would normally be required for individual dwellings in adjacent rural residential zones, even where those dwellings are proposed within an approved residential building platform.
- 3.19. While Section 6 of ‘Document 1’ in the Notified Private Plan Change package states that neighbouring property owners have been consulted, prior to the plan change being lodged to QLDC, we have not been contacted or consulted regarding the plan change request. The first time we were contacted by the Hills was the day after we were notified by the council which was the 15<sup>th</sup> August 2025. We have since had a meeting with the Hills and they offered to come back to us with some

imaging of mitigating the visual impact to our property of the proposed building sites. We only received these late on the 10<sup>th</sup> September and they reiterated our concerns that the development will have significant impact on our views and outlook. We have not had time to discuss these visual impacts with our planner or with the developer we feel it further supports our request for height poles to be erected in order that we can fully see the visual impact.

- 3.20. We acknowledge that the applicant is reliant on previous consents granted for the property, including RM081223 and RM081224 in terms of a degree of consented baseline. These consents approved both the subdivision and identification of seventeen additional homesites and building platforms within THRZ, including homesites in the southern part of the zone. The consents were granted on 4 June 2009 with a 10 year period to be exercised and therefore lapsed in 2019, six years ago.
- 3.21. In our opinion, the current plan change requested is materially different from those earlier consents. A key difference is that the previous consents were subject to a notified resource consent process and a thorough landscape and visibility assessment for the non-complying subdivision and land use activities proposed. They also included specific conceptual architectural designs prepared by Pattersons Architects and approved for each of the seventeen homesites, with the majority of these designs being subterranean. These concept plans approved for each of the building platforms included floor plans, elevations, renders, and detailed specifications for materials and colours.
- 3.22. While the current plan change will also be subject to a hearing and we appreciate that at this is the first stage of the plan change process which is seeking only the identification of homesites, we believe that a greater level of assessment is required to provide us with more certainty on potential effects of the plan change, particularly in relation to the additional homesites.
- 3.23. It is noted that while the 'Hills Design Statement' by RBT, dated 7 May 2025 (and submitted in response to an RFI request), includes a useful 'Concept Site Plan' showing building outlines and platform areas for each of the new homesites, no reference is made to this plan within any of the updated application documentation (dated 15 May 2024).
- 3.24. In their current form, the changes sought to the THRZ provisions allow for buildings within the homesites as a controlled activity, subject to controls on building coverage, height, building materials and light spill as well as the addition of LAMAs and new SPAs for these sites. However, these controls and standards do not require a specific design for each homesite, nor do they include a requirement for predominantly subterranean buildings. Given that none of the documents submitted in support of the plan change suggest that a consent notice (or land covenant) will be registered on the subject site, it is unclear how the design outcomes implied by RBT would be assured. It would be helpful to have certainty that similar design requirements will apply at the subdivision and landuse consent stages (both proposed as controlled activities) including limitations on the size of

each building platform as suggested in the RBT document, and specific design controls similar to those imposed by previous consents.

#### **4. RELIEF SOUGHT**

**4.1.** We seek that Council **decline** Plan Change 1 until such time as further assessment has been completed to accurately evaluate the potential impacts of the additional eleven homesites on adjacent properties, particularly those located along Hogans Gully Road, such as ours. In its current form, the Plan Change request does not provide adequate information to enable the effects of the activity to be assessed in accordance with the RMA and assessment matters set out in the PDP.

**4.2.** **Table 1** provides a summary of our specific submission points and relief sought. These points should be read in conjunction with the key reasons for our submission, specifically our concerns regarding the addition of eleven new homesites. These concerns relate to potential effects on our landscape and visual amenity values, the scale and density proposed, inconsistency with THRZ provisions, and the plan change process.

**4.3.** In summary, the relief sought includes:

- Refusal of the additional eleven homesites.
- Conditional support for mitigation measures, such as Landscape Amenity Management Areas (LAMAs), Structural Planting Areas (SPAs) and trail linkages, provided additional visual assessments and detailed design controls are implemented and can confirm the additional eleven homesites will not result in adverse effects on us.
- Implementation of additional design and landscape controls either via updated building standards or a consent notice (if appropriate) for homesites most visible from public and private viewpoints, including building platforms, specific conceptual architectural designs for each homesite, and further restrictions relating to bulk/height controls, exterior lighting restrictions, and landscaping/screening if required.
- Further assessment of residential visitor accommodation, including potential effects on rural amenity and visual privacy.

## 5. SPECIFIC SUBMISSION POINTS:

Table 1: Summary of Submission Points

	SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
1	<p>47.1.2</p> <p>Update the description of home site activity areas in <b>q.</b> to include reference to the additional eleven new home site activity areas.</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	<p>That the Council <b>REFUSE</b> the addition of eleven new homesites, on the grounds of adverse landscape and visual effects, inconsistency with THRZ purpose and objectives and lack of adequate assessment.</p> <p>If the Council were to consider the proceeding, we would request, at a minimum:</p> <ul style="list-style-type: none"> <li>• That profile poles and updated visual simulations be prepared from elevated private viewpoints to accurately assess visual effects.</li> <li>• That more specific design and landscape controls (via both building standards in PDP and if appropriate, a consent notice or land covenant) be imposed for homesites most visible from public and private viewpoints, including:</li> </ul>

SPECIFIC PROVISIONS		SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
				<ul style="list-style-type: none"> <li>- Specific building platform locations;</li> <li>- Specific architectural designs for each home sites.</li> <li>- Overall reduction of bulk and visibility of buildings.</li> <li>- Restrictions on exterior lighting and hard landscaping.</li> <li>- Landscaping/screening to integrate buildings with the surrounding landform.</li> </ul>
2.	47.1.5  Addition of Structural Planting Framework (SPA's)	Support	<p>We support the requirement for SPA's to be identified and established prior to the construction of buildings within Activity Areas Hs6 – HS16.</p> <p>However, further details are required to accurately illustrate the extent of this planting and how it will mitigate visibility from elevated properties on Hogans Gully Road, such as ours.</p>	<b>APPROVE</b> the SPA requirement, subject to confirmation through additional and accurate visual simulations from elevated viewpoints along Hogans Gully Road to ensure the SPAs will adequately mitigate views from our property.

SPECIFIC PROVISIONS		SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
3.	Policy 47.2.1.4 Amend Policy 47.2.1.4 to include reference to a connection between Hogans Gully Road and McDonnell Road.	Support	Support the additional walkway and cycleway through the zone connecting Hogans Gully Road and McDonnell Road.	<b>APPROVE</b> an additional linkage to the Wakatipu Trails Trust network and promoting active transport and supporting walking and cycling opportunities across the District.
4.	Policy 47.2.1.14 Include reference to SPAs in Policy 47.2.1.14(b)	Support	We support the requirement for SPA's to be identified and established prior to the construction of buildings within Activity Areas Hs6 – HS16.  However, further details are required to accurately illustrate the extent of this planting and how it will mitigate visibility from elevated properties on Hogans Gully Road, such as ours.	<b>APPROVE</b> the SPA requirement, subject to confirmation through additional and accurate visual simulations from elevated viewpoints along Hogans Gully Road to ensure the SPAs will adequately mitigate views from our property.
5	Rule 47.4.3 d  Requirement for LAMAs to be completed (not established) prior to construction of any buildings in any Activity Area with further information provided in the Rule on what “completed” means.	Support	We support the requirement for Landscape Amenity Management Areas (LAMAs) to be completed prior to construction to mitigate any potential effects on visibility of built form within these activity areas.	<b>APPROVE</b> the strengthening of this LAMA requirement.
6	Rule 47.4.3A	Support	We support the establishment of SPA's identified within THRZ as a controlled activity.	<b>APPROVE</b> the inclusion of SPA as a controlled activity.

	SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
	Addition of new rule to require Controlled Activity consent for the establishment of any SPA identified on the Structure Plan.			
7	<p>Rule 47.4.4</p> <p>Addition of homesites 6-16 to the controlled activity Rule for buildings.</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	Consistent with our comments under submission point 1, we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the inclusion of building within these homesites as a controlled activity until the potential adverse effects on landscape and visual amenity are adequately assessed and better understood.
8	<p>Rule 47.4.11</p> <p>Residential activity in HS1 – HS16 to be included as a permitted activity (addition of the eleven new homesites to this rule).</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	Consistent with our comments under submission points 1 and 7, we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the inclusion of residential activity within these homesites as a permitted activity until the potential adverse effects on landscape and visual amenity are adequately assessed and better understood.

SPECIFIC PROVISIONS		SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
9	<p>Rule 47.4.14</p> <p>Visitor Accommodation in HS1 – HS16 to be a permitted activity (addition of the eleven new homesites to this rule)</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	Consistent with our comments under submission points 1, 7, and 8, we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the inclusion of residential visitor accommodation (unlimited duration) within these homesites as a permitted activity, until the potential adverse effects on landscape and visual amenity are adequately assessed and better understood, and particularly given the potential impacts of visitor accommodation on surrounding residential amenity values.
10	<p>Rule 47.4.15</p> <p>Homestays in HS1 – HS16 to be a permitted activity (addition of the eleven new homesites to this rule)</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	Consistent with our comments under submission points 1, 7, 8, and 9 we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the inclusion of residential visitor accommodation (unlimited duration) within these homesites as a permitted activity, until the potential adverse effects on landscape and visual amenity are

	SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
				adequately assessed and better understood, and particularly given the potential impacts of homestays on surrounding residential amenity values.
11	<p>Rule 47.5.3</p> <p>Addition of maximum building heights for new home sites.</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	<p>Consistent with our comments under submission points 1, 7, 8, 9 and 10 we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the proposed building height of 6.5m until the potential adverse effects on landscape and visual amenity are adequately assessed and better understood. Following the erection of height poles and additional visual simulations from surrounding properties, it may be necessary to adjust the relevant building standards for the new homesites to appropriately mitigate visual impacts.</p>
12	<p>Rule 47.5.8</p> <p>Addition of maximum building coverage for new home sites.</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	<p>Consistent with our comments under submission points 1, 7, 8, 9, 10 and 11 we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the proposed building coverage percentages until the potential</p>

	SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
				adverse effects on landscape and visual amenity are adequately assessed and better understood. Following the erection of height poles and additional visual simulations from surrounding properties, it may be necessary to adjust the relevant building standards for the new homesites to appropriately mitigate visual impacts.
13	<p>47.7</p> <p>Delete current structure plan and insert new structure plan to include all of proposed changes and including addition of HS6 – HS16.</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	<p>That the Council <b>REFUSE</b> the new structure plan and specifically the addition of eleven new homesites, on the grounds of adverse landscape and visual effects, inconsistency with THRZ purpose and objectives and lack of adequate assessment.</p> <p>If the Council were to consider the proceeding, we would request, at a minimum:</p> <ul style="list-style-type: none"> <li>• That profile poles and updated visual simulations be prepared from elevated private viewpoints to accurately assess visual effects.</li> <li>• That more specific design and landscape controls (via both building standards in PDP and if</li> </ul>

SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
			<p>required, a consent notice) be imposed for homesites most visible from public and private viewpoints, including:</p> <ul style="list-style-type: none"> <li>- Specific building platform locations;</li> <li>- Specific architectural designs for each home sites.</li> <li>- Overall reduction of bulk and visibility of buildings.</li> <li>- Further restrictions on exterior lighting and hard landscaping.</li> <li>- Landscaping/screening to integrate buildings with the surrounding landform.</li> </ul>
14	<p>Rule 27.7.22</p> <p>Update subdivision controlled activity rule to include additional home sites and provide for HS1 – HS16</p>	Oppose	<p>Refer to paragraphs 3.1 – 3.25 of this submission.</p> <p>Consistent with our comments under submission points 1, 7, 8, 9, 10, 11, 12 and 13 we recommend that Council <b>REFUSE</b> the addition of the eleven new homesites. Consequently, we also recommend that Council <b>REFUSE</b> the changes requested to enable subdivision of these new homesites as a controlled</p>

SPECIFIC PROVISIONS		SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
				<p>activity until landscape and visual amenity are adequately assessed and better understood.</p> <p>If through the plan change process, it is deemed that the potential effects of the additional home site are acceptable, it may be appropriate to include reference to the conceptual building platforms (as shown by RBT in the Conceptual Masterplan) within this rule as a matter of control. This would help provide certainty regarding the location and scale of future dwellings while managing potential landscape and visual effects.</p>
15	<p>Rule 27.7.23</p> <p>Inclusion of additional home sites within Rule.</p>	Support	We support the requirement for LAMAs to be established prior to subdivision in order to mitigate any potential effects on visibility of built form within these activity areas.	<b>APPROVE</b> the strengthening of this LAMA requirement.
16	<p>Rule 27.7.24</p> <p>Inclusion of additional home sites within Rule.</p>	Support	We support the requirement for all subdivision within THRZ to provide the information required by Rule 27.7.22.	<b>APPROVE</b> the information requirements to apply to additional homesites.
17	<p>Rule 27.13.16</p>	Oppose	Refer to paragraphs 3.1 – 3.25 of this submission.	That the Council <b>REFUSE</b> the new structure plan and specifically the

SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
Delete current structure plan and insert new structure plan to include all of proposed changes and including addition of HS6 – HS16.			<p>addition of eleven new homesites, on the grounds of adverse landscape and visual effects, inconsistency with THRZ purpose and objectives and lack of adequate assessment.</p> <p>If the Council were to consider the proceeding, we would request, at a minimum:</p> <ul style="list-style-type: none"> <li>• That profile poles and updated visual simulations be prepared from elevated private viewpoints to accurately assess visual effects.</li> <li>• That more specific design and landscape controls (via both building standards in PDP and if required, a consent notice) be imposed for homesites most visible from public and private viewpoints, including: <ul style="list-style-type: none"> <li>- Specific building platform locations;</li> <li>- Specific architectural designs for each home sites.</li> </ul> </li> </ul>

SPECIFIC PROVISIONS	SUPPORT OR OPPOSE	REASON FOR OUR VIEWS	DECISION SOUGHT FROM COUNCIL
			<ul style="list-style-type: none"> <li>- Overall reduction of bulk and visibility of buildings.</li> <li>- Further restrictions on exterior lighting and hard landscaping.</li> </ul> <p>Landscaping/screening to integrate buildings with the surrounding landform.</p>

## 6. CONCLUSION:

- 6.1. As it stands and without the amendments (or other such appropriate relief) sought through this submission, we anticipate that Plan Change 1 will introduce additional visible dwellings into the landscape and although LAMA's and SPA's will assist in screening dwellings on these homesites in the long term, without any further landscape assessment, we are unsure whether this can be considered as effective mitigation.

## 7. SUBMITTER WISHES TO BE HEARD

- 7.1. We **do** wish to be heard in support of this application and will considering presenting a joint case with others presenting similar submissions.



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Signed by Submitters **James & Janene Draper**

**DATED:** 12 September 2025

### ADDRESS FOR SERVICE:

110 Hogans Gully Road, RD 1, QUEENSTOWN 9371

**Email:** [jpdraپر004@gmail.com](mailto:jpdraپر004@gmail.com)

[janenedraپر@icloud.com](mailto:janenedraپر@icloud.com)

**Phone:** 021 612 813