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Corbridge Plan Change – RFI dated 21 September 2026

Request for further information	Response
Planning Matters	
Provisions 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.	The 180 nights has been selected as that is part of the rule framework in the three other Resort Zones (ie. Gibbston Valley Resort Zone Rule 45.5.16, Hills Resort Zone Rule 47.5.17, Hogans Gully Resort Zone Rule 48.5.15). For these Resorts, the 180 day quantum was resolved through mediation and endorsed by the Environment Court. Note that the total number of residential units enabled by the Zone is 160, not 180 as in the question. The rule restricting residential use of visitor accommodation units to 180 nights must be seen in the context of the following factors also: (a) The overall restriction on residential units as a proportion of the overall number of units, in Rules 51.5.11 and 51.5.12. This is discussed further in Item 4 below; (b) Visitor Accommodation is permitted in Areas VA and VAR 1 – 15 (see Rule 51.4.13); (c) Residential Visitor Accommodation of unlimited duration is a permitted activity in Areas VA and VAR 1 – 15 (see Rule 51.4.17) (d) There is therefore strong focus on visitor accommodation in these activity areas, not just residential; (e) Residential Activity and Residential Units in Activity Area VA are non-complying (see Rules 51.4.20 and 51.4.21). (f) Overall, the proportion of residential units (max. of 160) in the total sum of units enabled in the Zone (450) is **36%**, which is lower than in The Hills Resort Zone (66 residential units, 150 units total = **44%**); and in the Hogans Gully Resort Zone (30 residential units, 76 units total = **39%**); (g) Residential activity is defined in the PDP as *"the use of land and buildings for permanent residential accommodation…"*. The intent of proposed Rule 51.5.14 is to restrict the permanent use of Visitor Accommodation Units. Rule 51.5.14 allows for limited residential use, restricted to 180 nights a year,

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	and therefore is not "*permanent residential accommodation*". Failing to meet this standard would require Non-complying activity consent, therefore the rules package supports the overall objective of achieving "*an integrated golf resort development that principally provides for a range of visitor industry related activities…",* as addressed in the s32 evaluation.
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.	The provision for 180 nights of 'residential activity' is really a consequence of the various definitions that exist within the District Plan. To work with the scheme of the rules it is necessary to address the activity that can be undertaken within the VA units otherwise activities that are not provided for will trigger consents which is neither efficient or effective. Including provisions for 'residential activity' for a maximum number of days provides clarity regarding the available uses outside of VA. 'Residential Activity' is the best fit in this regard because unit owners will not be paying a fee to stay in their properties. However, the limitation on the number of days ensures that those units cannot be utilised permanently for residential activity. However, it provides some flexibility for unit owners to come and go as they wish. As set out above 180 days has been adopted widely in Resort zones within the District and ensures that each individual unit to which this rule applies is used principally for visitor accommodation consistent with the objective of the zone, and the definition of Resort. Theoretically all of the VA units could utilise the 180-night residential allowance in the same year, but this is highly unlikely.
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.	The objective is about the entire Resort and not solely about the visitor accommodation offering. The resort is required to provide– two golf courses, clubhouses, driving range, the hotel and public hospitality offerings, as well as the visitor accommodation, in a staged manner that precedes tranches of residential development. This ensures that a Resort, by definition, will be established over time. The proportion of residential units to total number of units (36%) as discussed above demonstrates that the visitor activities, and visitor accommodation, are the dominant activities.
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.	Rule 51.5.12 restricts the maximum number of Residential Units in the Zone to 160, whilst Rule 51.5.11 enables a total of 450 units including VA units. The management mechanism will be imposed through conditions of future resource consents. This is similar to how it is managed in the Hogans Gully Resort Zone, with particular reference to the conditions of RM180497 where all lot owners are required to be part of a management entity and units are available to be used for short term visitor accommodation when not occupied for residential use. Further, Residential Visitor Accommodation of unlimited duration is a permitted activity in Activity Areas VAR 1 – VAR 15.
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.	Refer to above. The 180-night rule is consistent with existing Resort zones. At an individual unit level, it is consistent with the Objective of the zone to ensure a predominance of VA for each unit. Changing these numbers is unlikely to result in a practical difference to the way in which the zone operates.

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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.	
5. Amend the Structure Plan so the Wānaka Airport Outer Control Boundary is identified in the structure plan.	The Outer Control Boundary does not feature on the Criffel RISZ Structure Plan, similar to how ONL overlays do not feature on Structure Plans (eg. Sticky Forest). It is not necessary to amend the Structure Plan to include the Outer Control Boundary. The Outer Control Boundary features on the planning maps, and it is not necessary to show it on the Corbridge Resort Zone Structure Plan.
6. Include the area (in hectares) applying to Activity Area H in the Structure Plan.	Please refer to the updated Structure Plan.
7. Include the existing paper roads located within the Structure Plan.	The paper roads are to be treated as roads elsewhere in the plan. They do not have a conventional zone classification.
8. Provide an assessment of how the paper roads will be incorporated into the Zone's Structure Plan.	It is not proposed to incorporate the paper roads into the Structure Plan. The paper roads exist as a matter of law. The Structure Plan cannot change the applicant's ability to use the land within the paper roads, and the Applicant will have to accommodate the paper roads so long as they are legal road. What happens with the paper roads is a matter to be addressed separately. If the paper roads were stopped in the future they would 'take on' the zoning of the adjacent land and the Structure Plan would apply to them.
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.	
9. Provide information on the activity status for the establishment of the lake in Activity Area L.	Proposed new rule: *The construction and establishment of a waterbody within Activity Area L = controlled.* *Control is reserved to:* *a. Earthworks and erosion and sediment control measures;* *b. Stormwater design and management;* *c. Landscaping treatment and vegetation planting;* d. *Water quality and ecological values.*
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.	Additional works and consents will be required to establish the lake in Activity Area L. There is no reliance on RM100152, however it is understood that the consent was exercised. The Lake is associated with irrigation and has been used in recent times as per the attached photos.

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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.	
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.	That is correct. Subdivision complying with the staging provisions (and consistent with the Structure Plan) will require a controlled activity consent under Rule 27.7.1. This is clarified by the addition of the following words to Rule 27.7.34B.2: *Any subdivision that does not meet the staging requirements as set out below* [is non-complying]. This is consistent with the existing wording to express a breach status for subdivision rules that are effectively standards.
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.	They are inherently protected through the Activity Areas and will be subject to future resource consents that will impose conditions that will require compliance in perpetuity. Rule 51.4.7 (the establishment of any LAMA) includes a matter of control that relates to *'the mechanism (including registration of legal instruments, as appropriate) to ensure that…'* so the LAMAs would be subject to additional protection, by way of consent conditions at the time of establishment. Further, the Open Space and Golf activity areas are protected by the Structure Plan and the accompanying provisions which limit the activities within them. No updates to the provisions are required.
AEE **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.	
13. Include in the AEE and/or s32 Report any views of persons consulted and any response from the applicant.	Refer to Appendix B of Document 1 for an overview of consultation and engagement. This includes the views of persons consulted and where changes were made as a result.
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. 14. Provide an assessment of cultural effects in the AEE, in particular in relation to waterbodies and landscape values.	Consultation with Aukaha and TAMI is ongoing.

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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. 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.	CGW have prepared a Preliminary Lake Assessment which quantifies the probable rainfall runoff entering the proposed lake during rainfall events and estimates the resulting variations in lake water level. Further information and assessment will be required at the time of a resource consent application is prepared for the construction of the lake. This will include details surrounding inflow/outflow, management of water quality and water depths. Bird strike risk is assessed in the Ecological Assessment.
Section 32 **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.	
16. Provide an assessment in the section 32 report against SP 3.3.18 or 3.3.19.	*3.3.18 – Identify areas of significant indigenous vegetation and significant habitats of indigenous fauna, referred to as Significant Natural Areas (SNAs).* *3.3.19 – Protect SNAs and encourage enhanced indigenous biodiversity outcomes.* There are no existing SNAs nor is it proposed to identify any SNAs through the request. The indigenous biodiversity and ecological values of the site identified by Wildlands are proposed to be protected through Ecological Protection Activity Areas. These enable site specific ecological management and protection, which have been evaluated under s32(1)(b)(ii) in Table 6 of the s32 report.
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.	*3.3.24B – Protect Regionally Significant Infrastructure by managing the adverse effects of incompatible activities.* The Structure Plan and provisions avoid sensitive activities within the Outer Control Boundary and is consistent with NZS 6805:1992, and the Zone will protect the Wanaka Airport which is Regionally Significant Infrastructure. The development enabled by the zone will not give rise to incompatible activities adjoining the State Highway as built areas are well separated from the state highway and there is significant areas of open space land between the two. The safety and efficiency of the State Highway is protected through the staging provisions in Rule 27.7.34 and by the complementary rule, Rule 29.4.11B, in the Transport Chapter.

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18. Clarify if there is an assessment against SP 3.3.33.	*3.3.33 – For Rural Character Landscapes, identify landscape character to be maintained, and visual amenity values to be maintained or enhanced and related landscape capacity:* *a. for Priority Areas of the Upper Clutha Basin, in Schedule 21.23. in accordance with the values identification framework in SP 3.3.39 – 3.3.41 and otherwise through the landscape methodology in SP 3.3.45 and through best practice landscape assessment methodology; and* *b. outside of identified Priority Areas, in accordance with the landscape methodology in SP 3.3.45, and through best practice landscape assessment methodology; and* *c. through associated District Plan rules setting measurable spatial or other limits, and relates assessment matters, as to cumulative subdivision and development including as to location, quantity, density and design.* The site is subject to the Halliday Road / Corbridge Priority Area (21.23.1) which was identified under 3.3.33(a). The site is also subject to the Mata-au Clutha River Priority Area (21.22.25) (under 3.3.33(a)) and the Wanaka Environs Landscape Schedule (21.23.9) which has been notified, and hearing of submissions concluded. These Schedules identify landscape character and visual amenity values to be maintained or enhanced and landscape capacity for specific activities. No further assessment of 3.3.33 is required.
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 Standards, "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. 19. Clarify that the definition of "urban" is from the provisions in the NPS-HPL and not the National Planning Standards.	That is correct – 'urban' as a description of a zone in the NPS-HPL (Section 1.3 Interpretation). The proposed zone does not qualify as 'urban development' under the PDP.
Parks	
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. 20. Provide a public access plan that clearly shows where public access will be permitted/provided (in addition to the	The indicative cycleway / walkway is the only public access through the zone.

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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. 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.	21. Refer to updated Ecological Assessment, specifically Section 9.1. 22. Almost all exotic shelterbelts within the interior of the site will be removed (see Appendix 1). Small sections of shelterbelt on the southwestern boundary will be retained. These shelterbelts have low ecological values, and are largely comprised of three species classified as pest plants in the Otago Pest Management Plan – radiata pine, Corsican pine, and Douglas fir. Their removal would reduce the likelihood of wilding tree spread in the site and possibly in the surrounding area (although there are still many exotic trees in the wider area), and is considered to have positive effects. The retention of existing shelterbelts is considered to have a nil effect, as they are already existing and will not introduce any new adverse effects. The retained shelterbelts are also adjacent to existing shelterbelts on adjoining properties, so their removal would not remove these species from these locations. Exotic trees are a well-established feature of the district, and do not have adverse ecological effects at the scale of the existing shelterbelts. The small sections of retained exotic shelterbelts at the site contain individual of three pest plant species listed in the Otago Regional Pest Management Plan – radiata pine, Corsican pine, and Douglas fir. It is suggested that these individuals are progressively replaced with non-pest species when they reach the end of their lifespan due to death, disease or safety issues. These trees could be replaced by either exotic species that are not pests, or by indigenous species. This measure would ensure the long-term removal of all pest plants from the site, representing a positive effect. A new restricted discretionary rule, Rule 51.4.6, is proposed to manage this transition. It states: *The replacement of vegetation required to be retained by the Structure Plan* *Discretion is restricted to:* *(a) The successional replacement of the vegetation including:* *(i) Species;* *(ii) Grade and density of planting;* *(iii) Timing of planting in relation to timing of removal of the existing vegetation;* *(iv) Ongoing maintenance requirements;* *(v) Methods for retention of the planting in perpetuity* *(b) How the successional replacement planting maintains the landscape mitigation purpose of the existing vegetation.* Rule 51.4.7 (as renumbered) is modified to exempt the planting undertaken under Rule 51.4.6 from being captured by Rule 51.4.7. A minor change to Policy 51.2.1.2(d) is proposed to recognise the successional replacement rules as

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	above. To explain this for a plan user, a new section is included in the zone description section, at 51.1.6.
Transport Assessment (Document 11) <u>State Highway 6 (SH6) access, network effects and intersection performance (Section 7.1, 7.2 and 8.3).</u> 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. 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. <u>Trip generation and transport modelling assumptions (Sections 6 and 7).</u> 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. 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,	Please refer to the updated Transport Assessment. Rule 51.4.1 provides for the access from SH6 as indicatively shown on the Structure Plan. This is a controlled activity rule, and a new matter of control (road safety and efficiency) is added. To address the matters raised by the Council a new rule, Rule 51.4.2, is proposed to complement Rule 51.4.1. Rule 51.4.2 states: *Alternative access from State Highway 6.* *Discretion is restricted to:* *(a) Final location and alignment;* *(b) Entrance design (including lighting);* *(c) Materials and colour;* *(d) Edge and berm treatment (including footpaths (if required) and any lighting);* *(e) Stormwater management;* *(f) Road safety and efficiency;* (g) *The closure of the access otherwise provided for by Rule 51.4.1.* The purpose of this rule is to enable a new access from a different location than the existing, and likely to be (but not committing to) the Ballantyne Road location. There will only be one access to State Highway as per the Structure Plan and updated provisions. Please refer to the updated Transport Assessment and the following in response to 24 – 34. 24. An assessment is not appropriate at this stage, but the report has been updated to set out that when a roundabout is required, its location will also be required to be assessed as discussed at paragraph 8.3.5 onwards. 25. Intersections further from the site have not been assessed as discussed at paragraph 3.1.8 and 3.1.9. 26. An assessment of traffic generation is considered to be robust. However, a sensitivity test has been included of increasing the traffic generation by a third as discussed at paragraph 7.1.7 onwards. 27. This is addressed through the staging provisions in Rule 27.7.34 and by the complementary rule, Rule 29.4.11B, in the Transport Chapter. 28. The assessment has been updated to allow for residential use of the Visitor Accommodation units.

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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. 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. 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) 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.	29. Public transport is discussed at paragraph 7.3.4 onwards. There is no proposal for future private shuttle services or public transport to Wanaka through this Plan Change. 30. It is worth noting that public transport would not enter the site as the roads are private, but the expected passenger volume is unlikely to make any service economic to operate. 31. The modal share and distances travelled for walking and cycling are discussed at paragraph 4.2.1 onwards. 32. A future active travel connection is not compromised by the Zone as there is sufficient land adjacent to the State Highway that will remain undeveloped. Proposed new rule, Rule 51.4.4 provides for the construction of any walkway / cycleway not otherwise provided for by Rule 51.4.3 (the walkway / cycleway annotated on the Structure Plan) as a restricted discretionary activity. The matter of controls for Rule 51.4.3 include connection to existing routes, as does the matter of discretion in Rule 51.4.4. This will allow Council to consider connection to existing walking and cycling networks when processing applications for the construction of walkways and cycleways within the Zone. 33. As discussed above. 34. As discussed above. In any case, establishing an active transport connection relies on multiple stakeholders and the applicant can't do it on its own through the Plan Change process, nor is that considered to be required.

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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.	
Provisions	
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. 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 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.	35. It is reasonable to expect that an application for the walkway / cycleway will include engineering plans that detail the width and geometric design of the trail. 36. The indicative walkway/cycleway on the Structure Plan is purely an indicative alignment. The engineering detail will be provided at resource consent stage. 37. As discussed above, proposed new rule, Rule 51.4.4 provides for the construction of any walkway / cycleway not otherwise provided for by Rule 51.4.3 (the walkway / cycleway annotated on the Structure Plan) as a restricted discretionary activity. Cart paths associated with the golf course will form part of the resource consent application for the golf course construction under Rule 51.4.32. Detail regarding widths, materials and the specific routes will be provided at that stage.

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High Traffic Generating Activity 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. 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.	1,050 is derived by reading along the 'x' axis of NZTA Figure 8-2 to reach the expected Design Year traffic flow of 9,601 vehicles per day. The traffic volume on the minor road is then read from the 'y' axis at this volume and this equates to 1,050 vehicles per day. A right-turn bay is identified as being required from NZTA Figure 8-2 at 200 vehicles per day (Para 7.2.3). However a more detailed assessment (Para 7.1.2 onwards) shows that in fact it is needed before then. Roundabout treatments are shown on NZTA Figure 8-2 in the area bounded by the orange and blue lines. The NZTA graph does not set out any other intersection treatments.
Rule 27.7.24B.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. 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;	39. The assessment of any upgrade requirements to State Highway 6 intersection is required by Rule 27.7.34B.2 irrespective of the traffic generation levels, or whether a proposal breaches Rule 29.4.11B. 40. ~~A response to 40 – 42 will be provided subsequently~~. ***Response to points 40 – 42 as follows:*** The figure of 1,050 vehicles per day is read from NZTA Figure 5-2 for the expected traffic volume on State Highway 6. Broadly, this graph also shows that as the traffic volume on the major road varies, the threshold at which a roundabout is required also varies, based on the principle of providing the safest type of intersection for any given permutation of the flows on the roads. The number of crashes is influenced by the types of turning movements and the numbers of vehicles that make these movements. Consequently, as traffic flows on the minor road diminish (as assuming that the volumes on the major road stay the same), the exposure to risk declines and so a priority intersection becomes increasingly 'safe'. Conversely, as the number of vehicles on the minor road increases, the exposure to risk increased and so a priority intersection becomes more 'unsafe'. However NZTA Figure 5-2 has this relationship the other way around. In essence, at present Figure 5-2 shows that with (say) 10,000 vehicles on the major road and 1,000 vehicles on the minor road, then a priority intersection is appropriate. However with 10,000 vehicles on the major road and 500 vehicles on the

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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.	minor road, then a roundabout is required, despite the lower volumes halving the risk of a collision. The reason for this is not known, and a formal query has been raised with NZTA. Pending a response from NZTA, the only scenario where a roundabout would be required at flows of less than 1,050 vehicles on the minor approach would be if the traffic flows on the major road were greater than has been assessed. While this could arise (such as through traffic growth being greater than the anticipated 4.9% per annum for the next ten years), it is not considered that this is a particularly likely outcome.
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. 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	

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g. 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	
Wastewater network Capacity 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** 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.	43. Wastewater demand modelling has been provided in the Infrastructure Assessment Report prepared by Patersons. The modelling identifies an estimated impact of approximately 298.1 dwelling equivalents (DWE) across the three development phases, with development demand anticipated to be introduced progressively between Q4 2028 and Q4 2033. Confirmation of downstream network capacity and Project Pure treatment plant capacity remains subject to modelling of the wider QLDC wastewater network and associated infrastructure by QLDC. 44. Confirmation of any wastewater network upgrades, treatment plant upgrades, infrastructure trigger points, staging requirements or growth-related infrastructure investment remains a matter for QLDC and its infrastructure advisors. The applicant has provided development demand forecasts and staging information and has requested detailed network modelling from QLDC to assess available capacity and identify any infrastructure upgrade requirements. The final servicing strategy will be confirmed through detailed design and consultation with QLDC following completion of the relevant modelling. 45. The preferred potable water servicing strategy is connection to the QLDC water supply network via the DN250 trunk main at Stevensons Road. Onsite reservoir storage is proposed to buffer peak demands and reduce instantaneous draw on the wider QLDC network. Alternative groundwater supply options remain available; however, these would require treatment facilities, storage infrastructure, and ongoing operational management. 46. Sufficient water supply capacity, operating pressures and any upgrade requirements will be confirmed during detailed design based on the applicant's demand modelling and the outcomes of the QLDC network modelling currently being requested. There is nothing unique about the development that would require departure from the QLDC Land Development and Subdivision Code of Practice for water supply, storage or reticulation design. Firefighting storage requirements will be established during detailed design based on the FW classifications identified within the Infrastructure Assessment Report. 47. On the direction of initial conversations with QLDC Land Development Engineers, connection to QLDC services has been established in principle. Based on this advice, water take consents for onsite bores will not be required in the context of potable water supply. Onsite wastewater treatment and discharge is not preferred.

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	Site hydraulic modelling will be completed during the design phase to establish network specifications and reticulation requirements, including provisions for any intermediary pump stations and firefighting allowances. The applicant has provided revised water and wastewater demand assessments, together with staged development timing, to assist QLDC in assessing the impacts of the proposed development on the wider network. Further water and wastewater network modelling has been requested by the applicant from QLDC engineers. The outcome of this modelling will aid in answering queries regarding trigger points for QLDC network assets, available capacity and any infrastructure upgrade requirements. The nature and timing of upgrades required (if any) to QLDC networks and assets will be determined by QLDC and its engineers through their network modelling and assessment processes. The applicant has no oversight of wider network demands, growth projections or existing capacity constraints outside of those generated by the proposed development and is therefore unable to make those determinations.
Landscape	
Landform Visualisation Package and Landscape Assessment 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);	48. The visual simulations have been reviewed and updated, using before and after plans – see the package of plans from Baxter Design Group. This aligns with the TTatM methodology recommendations. The method of modelling the masterplanned design is addressed further by Mr Espie in point 50 below. It should be further noted that the golf course construction is now a controlled activity (see new Rule 51.4.32) with control reserved to: *(a) Effect on landform and visibility from the State Highway;* *(b) Erosion and sediment management;* *(c) Effects management measures for desert broom.* This ensures that any residual matters of landscape effects can be addressed at the consenting stage. In relation to the matters raised regarding the +/- 1m variance in RLs, the modelling is based on the worst case scenario; i.e. the highest RL in the +/- 1m range in any particular location has been used in the modelling and the landscape assessment. In considering this in light of the questions, the RL plans (at Rule 51.9) provide for a variation of +/- 1m within the specific locations shown on those plans. The final specific RL for each location would be determined during the detailed design for the subdivision, under Rule 27.7.34B. To lock this outcome in, a new matter of control has been added to the rule, as follows: *(g) The specific RL of building locations in Activity Areas VAR 4 – 6, 8, 9 and 11 – 15, taking into account the RL Plans at Rule 51.9*

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• 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. 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.	This would allow the Council to assess the final RLs, if necessary, in tandem with exercising matter of control (d) for the LAMAs, to ensure that the purpose of the LAMAs is achieved. The new matter of control (g) in the subdivision rule as above necessitates a consequential change to Rule 51.5.2 (the maximum height rule for buildings) and the accompanying explanatory note, as follows: *51.5.2 The maximum building height shall be as follows:* *…* *(h) **Activity Areas VAR 4 – 6, 8, 9** and **11 – 15** — 5.5m measured from the RL levels – see Note 2(a) below* *Note 2: The building heights are rolling heights and:* *(a) shall be measured from the specific RL determined at the time of subdivision (Rule 27.7.34B) for **Activity Areas VAR 4 – 6, 8, 9** and **11 – 15**;* *(b) shall be measured from Ground Level for all other Activity Areas.* This ensures that the building height is measured from the specific, final RL for the particular site in Activity Areas VAR 4 – 6, 8, 9 and 11 – 15 and not from an undefined level within the variance limits of the RL Plans at Rule 51.9. This further avoids uncertainty in translating the modelled visual outcome into the final as-built visual outcome. The RL Plans are further addressed under point 64 below.

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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.	49. Through our ongoing engagement with Aukaha and Te Ao Marama Inc., no mana whenua values of relevance to landscape have been raised, and no further evaluation is required.
<u>Reliance on Baxter Design Documents (Indicative Masterplan)</u> 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*), *<u>the indicative Masterplan and the Typical Housing Cluster Plan</u>*. LAR para 16: The Baxter Landscape Design Package Document also contains *<u>indicative plans and illustrations of the vegetative treatment of development AAs</u>*. As each AA is developed, detailed landscape design will be formulated in accordance with these indicative plans. My emphasis added.) 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. 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.	50. Mr Espie considers that it would be difficult and not overly helpful to model the entire activity areas as large blocks, and that modelling the indicative masterplan outcome is appropriate as that is a realistic outcome that the Zone will provide for. The masterplan outcome modelled is of the maximum extent that the development controls provide for (in respect of location and height of built development) rather than a reduced or best-case scenario situation. No outcome enabled by the Zone would have worse visual effects than what is modelled. The landscape effects assessment has used the indicative masterplan (and images of it) as a useful, realistic outcome but there is no need to lock in that particular outcome as there may be various permutations within the constraints of the location (of the activity areas), the RLs and the height limits, as well as the design controls. Mr Espie considers that within these constraints there is very little wriggle room for significantly different outcomes to occur than is shown in the visual simulations. He also notes that the modelling includes accessways, LAMAs, existing and proposed vegetation, fairways and greens, and with all these included elements the modelling demonstrates a fully realistic outcome. Other layouts provided for by the provisions might look slightly different but will not look any more visible or have a meaningfully different landscape outcome. The landscape and visual effects assessment work has used the indicative masterplan and visual modelling as helpful tools but has been fully cognisant that the Structure Plan and provisions allow for different outcomes. However, no risks have been identified that any development outcomes provided for will have materially worse effects than what has been assessed. 51. The proposed development standards will deliver the rural built form character articulated in the Baxter Design documents. As above, the standards include control over location (through the structure plan activity areas), maximum height, building coverage, setbacks from internal boundaries, building materials and colours, roof form (as discussed further in point 67 below), lightspill, and total development capacity in the Zone for residential and visitor accommodation units. 52. The bird strike issue is addressed in the Ecological Assessment submitted with the Plan Change request (DOCUMENT 6). A bespoke approach to planting species is not necessary for the lake in Activity Area L. There are no wetlands within the site.
<u>Existing Environment</u> The LAR relies, to at least some degree, on the Silverlight Studios, rural living and function venue consented development as the starting	53. Mr Espie's Landscape Assessment recognises the existing Silverlight Studios consent and the 35 lot rural-residential consent. These consents are still "live", and Mr Espie has taken into account the

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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. 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.	potential for one or other of them to be implemented if the Plan Change is not confirmed. It is very unlikely that the Silverlight development would proceed (because this is outside SIO's business model) and therefore it has limited relevance to the existing environment, but it is relevant to the assessment of landscape in the sense that the PA schedule refers to it, and so the landscape values to be maintained are those described with the Silverlight proposal in play. We therefore consider that Silverlight is not necessarily relevant from an effects point of view, but it is in relation to the policy assessment. It is highly likely that the consented rural-residential development would proceed if the Plan Change does not, however, and this consent is therefore a useful and viable outcome and it should be considered to be part of the existing environment. It is the fall back if the Plan Change is not successful.
<u>Upper Clutha Track</u> 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.	54. This is addressed under point 66 below.
<u>Proposed Planting</u> 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.	55. Agree with the points made, and a species list is now included in the Zone provisions, at 51.10. The species included are intended to fulfil the intention to establish a cohesive landscape character including a cohesive vegetation character. 56. The species planting list (now included at 51.10) includes taller species such as kowhai, mountain beech, kanuka, ribbonwood, and totara. LAMA is a controlled activity under Rule 51.4.10, with control over the effectiveness of the LAMA proposed in terms of contribution to visual coherence and amenity, whether it ensures integration and whether it provides adequate mitigation of future buildings proposed within the relevant Activity Area when viewed from public viewpoints outside the Zone, including (among other matters): (i) the size, volume and batter of any earthworks required; (ii) the extent to which the earthworks are congruous with the landscape. (iii) the species mix, proposed density and location of any new vegetation and its size at planting and maturity. This rule works alongside the rule for buildings (Rule 51.4.14) which includes assessment of the appearance of the building (including effects on visual and landscape values), effects on visual amenity, and landform modification, landscaping and planting. Given the locational constraints on where built form can occur (as dictated by the Structure Plan), the RLs, the height limits, coverage limits, roof form control, and material and colour controls, there is

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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). 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).	sufficient regulation in the architecture of the provisions for ensuring that the landscape intent of the Zone is achieved as the consenting progresses.
<u>Clarification of wording / provisions</u> 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 <u>rural</u> views*" 58. Consider whether 51.2.1.13 (e) is ambiguous and should instead read: *<u>Ensure that the LAMA landforms are designed to blend with the existing topography</u>*. 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. 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). 61. Confirm whether a section on the Landscape Protection Area should be included within Rule 51.4.	57. Agree – this change has been made to 51.1.4. 58. Agree – the clause has been modified as follows: *Ensuring that the LAMAs are designed to blend with the natural line and form of the existing topography.* 59. Agree – a new section 51.1.5 has been added. This provides a brief explanation of the location and purpose of Activity Areas LP and LP-E. 60. We do not consider that Policy 51.2.1.2(d) should be amended. Most of the proposed Zone, including all areas within which landscape change and built development are enabled, is not within the ONL. The ONL part of the Zone is within Activity Area LP-E which does not enable any development and only enables landscape protection through ecological maintenance and enhancement. This is consistent with the existing framework for managing ONLs in Chapters 3 and 6, and no further provisions are necessary in proposed Chapter 51.

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62. Confirm whether LAMA Plans should include a key to identify what the red, blue and black linework relates to for plan users. 63. Clarify what LAMA plans are referencing regarding Baxter Design Sketches (in LAMA 1 plan, LAMA 3 and 6 Plan). 64. Clarify the graphic approach regarding RL plans to convey where various RLs apply in an activity area. 65. Amend Visitor Accommodation Activity Areas to include a 300m^3 limit per unit for earthworks. 66. 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. 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. 67. 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. 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.	Further, there is no policy direction in the PDP to support the idea that effects need to be avoided in RCL landscapes that can be seen from an ONF, and noting that a number of the consented rural living building platforms are in close proximity to an ONF. 61. We consider that Rule 51.4 sufficiently provides the regulatory regime for Activity Area AA LP – see for example: Rules 51.4.5 (permitted status for landscaping, amenity planting, indigenous vegetation and removal of exotic vegetation); 51.4.6 (establishment of the CREMP); 51.4.9 (non-complying status for clearance of indigenous vegetation); 51.4.10 (establishment of the LAMAs); 51.4.15 (non-complying status for buildings); 51.4.17 (non-complying status for vegetation); 51.4.23 and 51.4.24 (non-complying status for residential activity, and for residential units); and 51.4.31 (permitted status for recreation etc.); and 51.4.34 (permitted farming etc). Any other building or other activities are non-complying (through default Rule 51.4.43). 62. The key to the red, blue and black lines has been added. 63. The references to the plans SK60 and SK49 have been deleted from the LAMA plans (LAMA 1 Plan and LAMA 3 & 6 Plan respectively). Where plans reference other plans that are to be contained in the Chapter provisions, the common name of that plan is referenced (eg. “LAMA 1 Plan”) rather than the Baxter Design numbering of the plan (eg “SK105”). 64. The graphic approach regarding the RL Plans is explained further on the updated RL Plans by the addition of the following note: • *The shading within the VAR areas depicts the transition of elevation from the higher to the lower RLs within each VAR area. The shading does not denote a specific RL.* The RLs provided on the RL Plans denote the RL and the range (+/- 1m from the stated RL), and the final finished ground level in each particular location would be determined at detailed design stage, during the subdivision consenting. The new matter of control (g) in Rule 27.7.34B, as discussed above under point 48, provides the method for the Council to set the final RL within the available +/- 1m range in the context of the specific site and alongside the LAMA assessment. This provides sufficient authority for the Council to accurately assess and if necessary make changes (through conditions) to the final RLs. 65. The Chapter 25 rules include a 300m^3 limit for each unit in the VAR activity areas.

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	66. A digital terrain model and cross-section are provided in the updated package of plans from Baxter Design Group, dated 23 October 2026. These demonstrate that built development within Activity Area H will not be visible from the public trails that follow the Clutha Mata-Au River. No further assessment is necessary. 67. Agree, and a new standard is included – see Rule 51.5.7 for roof form in Activity Areas VAR 1 – 15. 68. The Structure Plan on the aerial base is included in the updated package of plans from Baxter Design Group.
Ecology	
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. 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. 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	69. Please refer to the updated Ecological Assessment. A column with this assessment has been added to the Avifauna table, Appendix 4. Invertebrates and lizards are discussed at Sections 7.2 and 7.3. This has been slightly reworded to make it more explicit for invertebrates in Section 7.3. 70. Please refer to Section 7.2 of the updated Ecological Assessment which has been amended for clarity. Habitats have been assessed by a herpetologist. 71. The Ecological Assessment assumes C. otagensis is present on desert broom hoplants and defers management to the time of a resource consent application. This is considered an appropriate time to undertake the assessment. Other points relating to this species: • C. otagensis has not been seen since 1981 and only four specimens have ever been found. It is likely to be highly cryptic and hard to find and recognise. Therefore, assuming it is present and managing as appropriate is safer than relying on a survey. • Populations could come and go over the years, so the most certain time is when consent is underway to ensure information is up to date. • There is only an effect where/if desert broom host plants are removed. This will not be determined until a resource consent application is prepared. • Effects management measures for desert broom will need to happen prior to development regardless, so the survey effort is not important at the plan change stage. Assuming their presence is a logical and efficient way to deal with this at the Plan Change stage (refer to Section 10.5 of the Ecological Assessment). This is included in the Plan Change provisions (see Rule 51.4.32 and relevant matter of control), as well as the appropriate protocols for survey and removal of host plants if any plants are affected. Survey methods will include a walkover survey by day and night, live-capture pitfall trapping (including by desert broom plants), beating broom plants by day and night, and light trapping at night for moths.

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would result in "*less than minor to nil*" effects on Cerius otagensis (if present) given this species' threat classification of 'Nationally Critical'. 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. 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.	Further general point: • Key habitats of Threatened or At Risk invertebrate species possibly present on site are all retained and/or enhanced through the Corbridge Resort Zone Structure Plan and provisions, except for possibly a few scattered desert broom plants in one area of grassland. Surveys are therefore not important for effects management. Section 10.5 of the Ecological Assessment has been updated to incorporate this. 72. It is reasonable to assess this population as meeting the distinctiveness criterion. This has been added to the assessment in Appendix 5 and Section 8.2 of the Ecological Assessment. 73. This has been clarified in Section 8.2 of the Ecological Assessment. An additional figure (Figure 3) has been added to remove any doubt. *74.* This point relates to lizard habitat and fragmentation (not lizard death/injury) in Section 7.3. This outcome is anticipated because only a small amount of modified habitat will be removed during construction, but a substantially greater area of higher-quality habitat will be established prior to Stage 1 works. The overall outcome is therefore almost certainly positive for lizard habitat and connectivity. The Ecological Assessment has been updated for clarity (refer to Section 9.3). 75. This relates to Section 9.1, which states that about 14 individual plants could be lost from the site (not 14% of plants from the site): *"Loss of approximately 14 scattered individuals of desert broom would occur, representing a small proportion of the population on site. This effect is considered less than minor without effects management. Effects can easily be managed to provide a net positive outcome (see Section 10)."* Wildland's opinion remains the same, that this is a less than minor effect. This is due to the large population present on the site, combined with the assumption that the substantial replanting of indigenous shrubland will include plenty of desert broom. The second part of this was inferred but has been made explicit in the updated Ecological Assessment. The "less than minor to nil" effects on Cerius otagensis is because of the much greater overall population of desert broom resulting from the plan change. It also reflects the proposed management measures if desert broom plants are removed (see response to 71 above). 76. The updated Ecological Assessment is considered to provide an appropriate and adequate level of information for a plan change process on how adverse ecological effects will be dealt with. Flora and fauna management plans, and details around irrigation, herbicides and lighting, would usually be developed at the time of a detailed consent application. The Assessment demonstrates that there is the ability to manage the adverse effects at the site through these more detailed means at the time of consenting any development. 77. No notable ecological values are present in the proposed lake area – it is just cropped land at present. Water levels, algal blooms and water quality are beyond the expertise of Wildlands. However, additions to Sections 9.1, 9.2 and 10.3 of the Ecological Assessment have been made in relation to effects

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	assessment for the lake, relating to vegetation and avifauna. It is noted that the construction of the lake will require a resource consent, at which time detailed design will be undertaken and assessment of water levels, quality and agal blooms can be provided.

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