

Smart Growth Committee

22 September 2026

Report for Agenda Item | Rīpoata moto e Rāraki take [1]

Department: Planning & Development

Title | Taitara: Private Plan Change 2: Arrowtown South Special Zone Rezoning.

Purpose of the Report | Te Take mō te Pūroko

The purpose of this report is to seek a decision from the Smart Growth Committee on how to proceed with a Private Plan Change (PPC) request from Arrowsouth Properties Limited (APL: Requestor).

The PPC request seeks to amend the district plan provisions that apply to 7.55 hectares of land that is currently within the Arrowtown South Special Zone (Chapter 12) of the Operative District Plan (ODP). The Requestor seeks to apply the Proposed District Plan (PDP) to the land, including the PDP Suburban Residential Zone and District Wide Chapters, with accompanying location-specific provisions.

The PPC request is made pursuant to clause 21 of the First Schedule of the Resource Management Act 1991 (RMA). PPC's that are *adopted* by the Council¹ are subject to Planstop², however PPC's that are *accepted* are not subject to Planstop and therefore do not require approval from the Minister for the Environment to proceed.

Recommendation | Kā Tūtohuka

That the Smart Growth Committee:

1. **Note** the contents of this report;
2. **Accept** the Private Plan Change 2 - Arrowtown South request in whole under clause 25(2)(b) of the First Schedule of the RMA 1991 and notify the request under clause 26 of the First Schedule of the RMA 1991; and
3. **Note** that the outcome of the Smart Growth Committee's decision will be reported to Council at the next Council meeting.

¹ Pursuant to cl25 of the First Schedule of the RMA.

² Pursuant to s80U(3) of the RMA.

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Title: Policy Planner

9 September 2026

Reviewed and Authorised by: Dave Wallace



Name: Dave Wallace
Title: General Manager Planning &
Development
9 September 2026

Context | Horopaki

Private Plan Change Background

1. The PPC was formally lodged by APL on 9 March 2026 and seeks to change the zoning of the site from the ODP Arrowtown South Special Zone (ASSZ) to the PDP Suburban Residential Zone (SRZ), so as to enable low density residential subdivision and development within the Site. The entire ASSZ is shown in light green in Figure 1 below.
2. Figure 2 below shows the 7.55ha portion of the ASSZ which is proposed to be rezoned to SRZ. **Attachment A** to this report includes a link to the Requestor's full PPC request and associated documents, which are publicly available on the Council website.

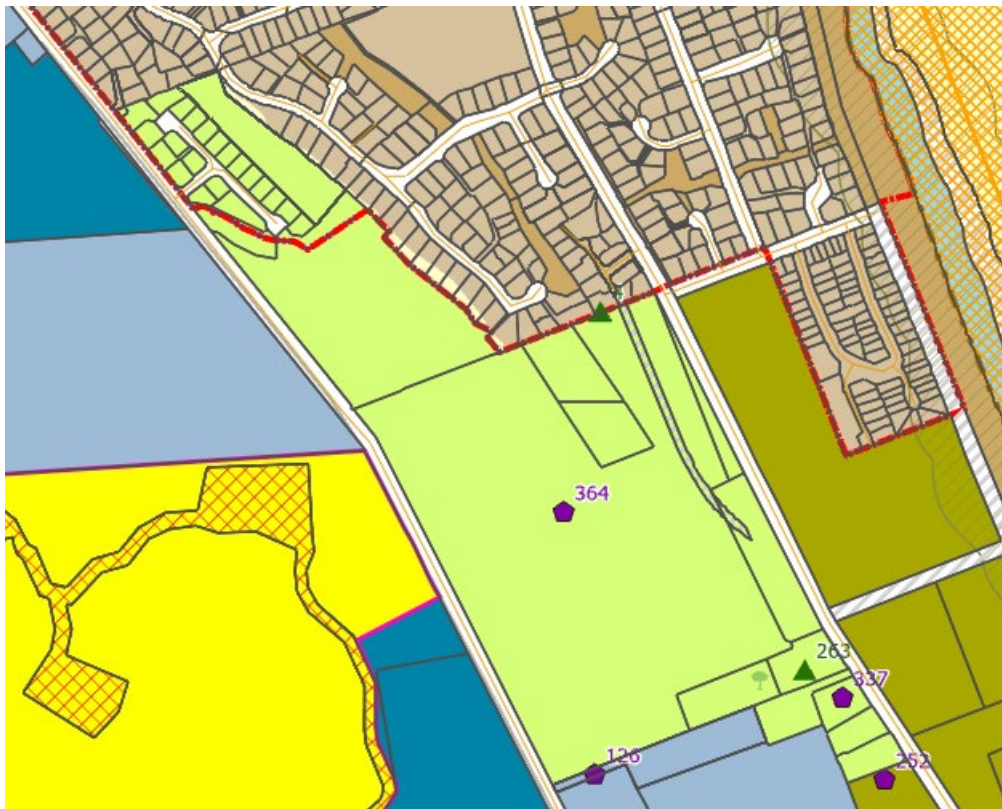


Figure 1: ASSZ - Light Green

Source: ODP planning map

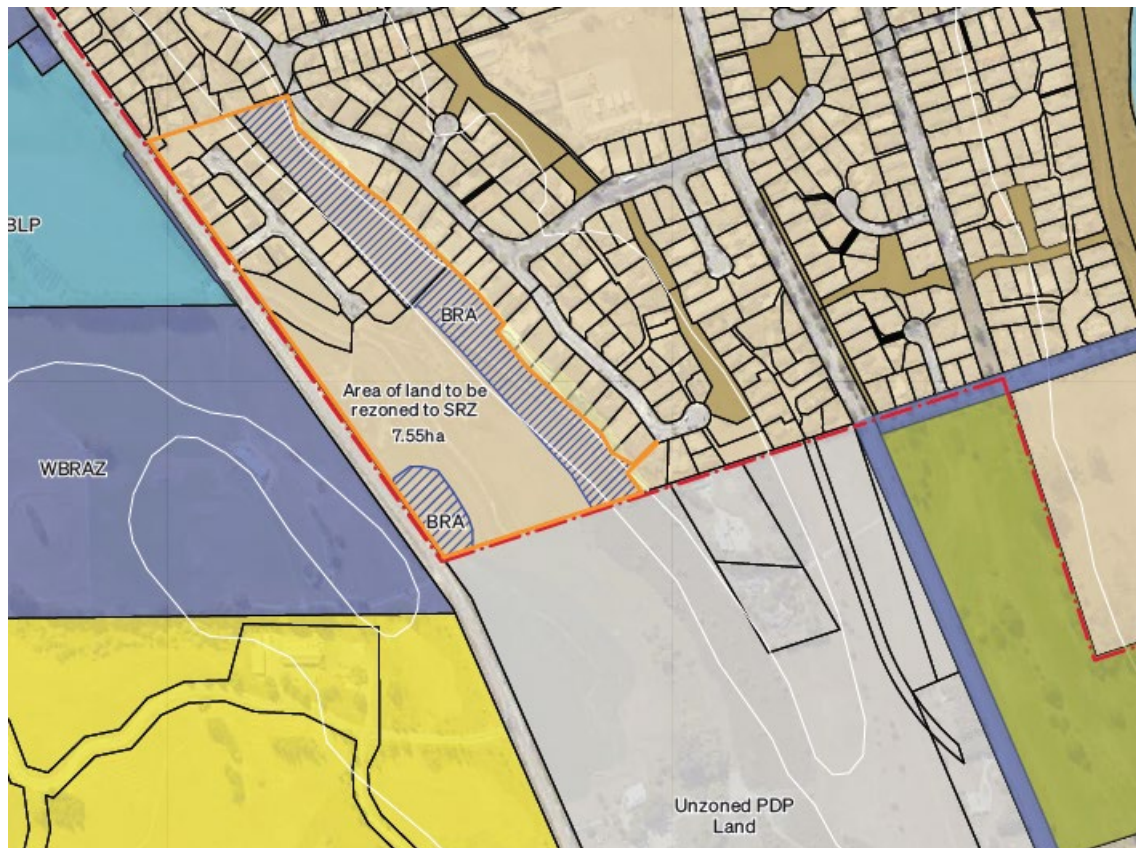


Figure 2: PPC 2 land shown within orange outline.

Source: Appendix G Proposed Zoning Map in the PPC 2 request linked in Attachment A.

3. The PPC proposes to include bespoke provisions in PDP Subdivision Chapter 27 to apply landscaping requirements for the site. Additionally, the Requestor proposes to apply a Building Restriction Area (BRA) overlay on sensitive land identified within the site. The BRA is an existing method used in the PDP to restrict buildings on land identified on the web mapping application.
4. In addition, the PPC seeks to amend the current location of the Urban Growth Boundary (UGB) to shift it to the south so that it aligns with the APL site boundary. The UGB is an existing method used in both the ODP and PDP whereby a boundary is shown on the District Plan web mapping application which provides for and contains urban development within an urban area.
5. Following receipt of APL's PPC request, a formal Request for Further Information (RFI) was made by the Council on 09 April 2026 pursuant to clause 23 of the First Schedule of the RMA. The information requested was in relation to transportation, infrastructure servicing, landscape, ecology, urban design and the Section 32 Evaluation, see **Attachment B**.
6. APL responded to the RFI on 15 July 2026 and submitted an updated PPC request. Upon review of the updated request, Additional Information under clause 23 of the First Schedule of the RMA was requested on 5 August 2026. On 4 September 2026, APL formally responded to this Additional Information Request and provided another updated PPC request.

7. In accordance with clause 25 of the First Schedule of the RMA, following receipt of the Requestor's response to the formal request for Additional Information, Council must within 30 working days consider the request and make a decision to either accept, adopt or reject the PPC request in whole or part. The Council also has the option to decide to deal with the request as if it were an application for a resource consent.

Existing Zone Background & History

8. The ASSZ covers approximately 30 hectares of land which adjoins the established residential southern area of Arrowtown. It is bounded by Centennial Avenue, McDonnell Road and the Arrowtown Golf course. It is comprised of two distinct areas as a result of a steep escarpment that runs through the zone and a tributary to the Arrow River, which generally flows along the toe of the escarpment.
9. The majority of the ASSZ Residential Activity Area to the east of the site has now been developed with low density housing, this area is contained by the current UGB. There is an established walkway which allows access from the ASSZ into Arrowtown via Centennial Avenue and is surrounded by Private Open Spaces. The remaining area of the ASSZ, which is outside of the PPC site, comprises a Rural Living Activity Area, with 17 building platforms all of which appear to have been developed and additional Private Open Spaces. To address the need for development in this area to maintain and enhance these ecological and landscape values, a special zone was deemed appropriate for this area when the ASSZ was developed in 2013-2014.
10. The ASSZ became operative in 2015 following a decision by Council on Plan Change (PC) 39 to the ODP. The approval of PC 39 was subject to consideration of PC 29 which concerned the Arrowtown Urban Growth Boundary (a decision issued by the Environment Court [2013] NZEnvC 12). Following a hearing and appeals to the Environment Court, [2014] NZEnvC 117 & [2015] NZEnvC 25, PC 39 was substantially reduced in scope and instead provided for a lower level of residential development.

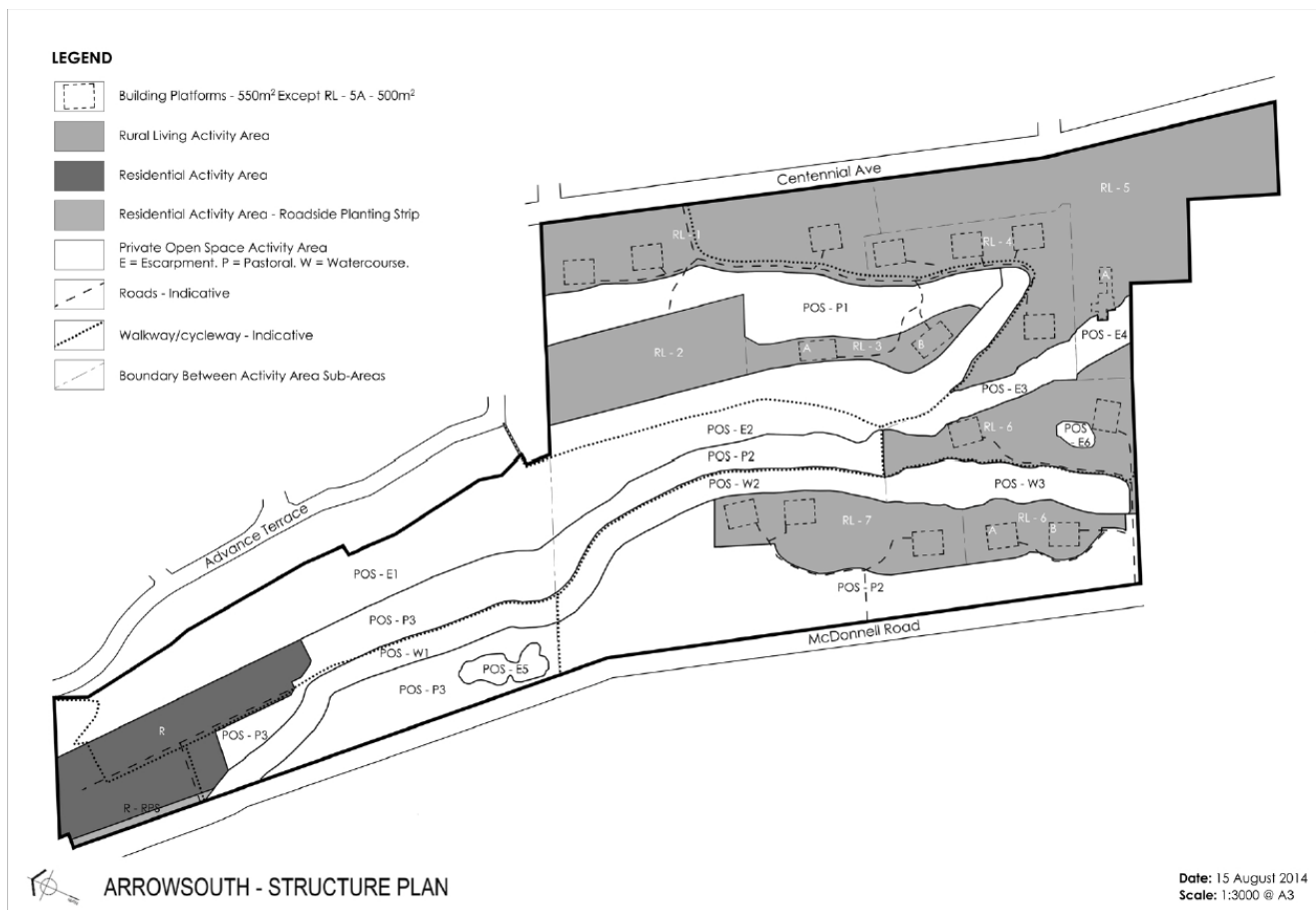


Figure 3: Existing Structure Plan for ODP ASSZ (approved under PC39)

Source: ODP provision 12.32

Analysis and Advice | Tatāritaka me kā Tohutohu

Summary of changes sought by the PPC request

- The PPC request applies to 7.55 hectares of land within the ASSZ shown in Figure 2, above, within the solid orange line. The Requestor seeks to increase the development entitlement to provide for up to 44 residential lots within approximately 2.34 hectares by applying the PDP SRZ. Vehicle access is proposed to be provided from McDonnell Road and Brodie Avenue.
- The Requestor also seeks to apply a BRA on sensitive land, where residential subdivision and development is considered inappropriate. This includes the steep escarpment, part of which is Existing Communal Privately Owned Land within the ASSZ. Additionally, the BRA is sought to be applied to the Rocky Outcrop (currently defined as POS-E5 on the existing ASSZ Structure Plan) which contains geological features to the south-west of the site, as shown in Figure 2, above.

Options Analysis

- This report identifies and assesses the following reasonably practicable options for assessing the matter as required by section 77 of the Local Government Act 2002.

14. Council is required under clause 25 of the First Schedule of the RMA to either adopt the PPC request (in whole or in part), accept the PPC request (in whole or in part), deal with the PPC request if it were an application for resource consent, or reject the PPC request (in whole or in part). These four options are addressed below.
15. Option 1 Accept the PPC request in full or in part
16. Under clause 25(2)(b) of the First Schedule of the RMA, the Council may accept a request for a plan change in whole or in part. By accepting a PPC request the Council is not signalling whether the PPC should be ultimately granted or refused on merit; or that changes should not be made. Accepting a PPC request enables public notification and submissions to occur, a period of evaluation, and a Council hearing to determine the merits of the proposal. The final decision on the PPC would be made by the Council, when it considers the recommendations set out in the Independent Hearing Panel's Recommendation Report issued following a Council hearing. In this instance no reason has been identified as to why the Council would only accept part of the PPC request rather than the whole of it.

Advantages:

- Accepting the PPC request would mean that the costs of progressing the PPC would be borne by the Requestor. Given the nature of the request and potential benefits of the PPC to the Requestor (increased development entitlement), it is appropriate for the Requestor to meet the PPC costs, as provided for by the RMA. The Council will have the opportunity to have input on the PPC through the submission process and subsequent evidence exchange.
- The Requestor has responded to Council's Requests for Further Information which has provided the information needed to make a decision as required through clause 25(1) of the First Schedule of the RMA.
- Accepting the PPC request would enable the opportunity for submissions, further submissions, evidence and a public hearing on the PPC.

Disadvantages:

- Accepting the PPC request means that it will remain under the APL's editorial control and APL may not agree to changes sought by submitters. However, this is mitigated by the submissions process, which includes the opportunity for Council to make submissions that raise matters for the Hearing Panel to consider. The Hearing Panel can also recommend that the Council refuses the PPC or approves amendments to the PPC, within the scope of matters raised in submissions.
- Since the Requestor is only seeking for a portion of the ASSZ to be reviewed and brought into the PDP, it will result in the remaining ASSZ land remaining unreviewed (and therefore remaining zoned ASSZ in the ODP).

17. Option 2 Adopt the PPC request in whole or in part

18. Under clause 25(2)(a) of the First Schedule of the RMA, the Council may adopt a request for a plan change in whole or in part. Doing so has the effect of making the plan change a Council-initiated plan change. In this instance no reason has been identified as to why the Council would only adopt part of the PPC Request rather than the whole of it.

Advantages:

- Under this option, the Council would have greater control over the proposal and how it proceeds. The proposal may also be able to be better integrated with other workstreams being undertaken by Council where/if relevant.
- Adopting the PPC request would provide the opportunity for the scope of the plan change to be extended to include all the land in the ASSZ, not just the 7.55ha portion of the site that the Requestor is seeking to update into the PDP (though this option would require substantially more work by council prior to notification).

Disadvantages:

- Adopting the PPC request would mean that the costs associated with its processing would fall to Council. It would also signal that the Council has decided to support the PPC.
- The PPC does not support any current Council workstreams, and there are no advantages for Council to divert resources away from other current work programmes.
- Earlier cost/benefit analysis had concluded that this part of the proposed District Plan review could be managed and funded by landowners through a PPC process.
- Due to Plan Stop, Council would be required to receive approval from the Minister of Resource Management Reform for an exemption for this Plan Change to proceed under this option.³

19. Option 3 Reject the PPC request / Status Quo option

20. Clause 25(4) of the First Schedule of the RMA allows the Council to reject a request for a private plan change (in part or in whole), but only on the following grounds:

- (a) *the request or part of the request is frivolous or vexatious; or*
- (b) *within the last 2 years, the substance of the request or part of the request—*
 - (i) *has been considered and given effect to, or rejected by, the local authority or the Environment Court; or*

³ See s80U(3) of the RMA.

(ii) *has been given effect to by regulations made under [section 360A](#); or*

(c) *the request or part of the request is not in accordance with sound resource management practice; or*

(d) *the request or part of the request would make the policy statement or plan inconsistent with [Part 5](#); or*

(e) *in the case of a proposed change to a policy statement or plan, the policy statement or plan has been operative for less than 2 years.*

21. A PPC request may be rejected under clause 25(4)(b) if the ‘substance of the request or part of the request’ has been considered and been given effect to by the local authority or Environment Court, has been given effect to by regulations under Section 360A; and may be rejected under clause 25(4)(e) if the relevant provisions have been operative for less than 2 years.

22. Subclauses (a), (c) and (d) of clause 25 are not considered to apply in this instance. The request is not frivolous or vexatious, there is no suggestion that the request is not in accordance with sound resource management practice, and the request (or part of it) would not make the District Plan inconsistent with Part 5 of the RMA (which prescribes the purpose and contents of district plans, and how they must reflect the other relevant policy and planning instruments). The interests of sound resource management practice would be best served through practical opportunities for people to be included within the process through the acceptance of the request which allows for members of the public to submit on the proposal.

Advantages:

- None identified.

Disadvantages:

- A local authority can only reject a plan change request on the specific grounds under clause 25(4) of the First Schedule of the RMA. As set out above, it is considered that none of those grounds apply in this instance. Rejecting the request may therefore result in a challenge to the lawfulness of that decision, potentially risking legal costs to Council.
- The zoning would remain under the ODP, arguably adding planning complexity to those who wish to develop this land. Council was seeking to undertake a plan change for the Special Zones remaining under the ODP prior to the Plan Stop legislation being released.

23. Option 4 Deal with the PPC request as if it were an application for a resource consent.

24. Clause 25(3) of the First Schedule of the RMA allows the Council the option to treat a request for a PPC as if it were an application for resource consent under Part 6 of the RMA.

Advantages:

- There have been no advantages identified for this option.

Disadvantages:

- The amendments requested in the PPC request could not be entirely addressed through the resource consent process. The extent to the proposal's requested changes to the Zone's existing Activity Areas and Structure Plan are unsuited to a resource consent proposal.
- Given the extent of changes sought to the current planning provisions that apply to the PPC land, a number of Non-Complying Activity resource consents would be required to achieve the development entitlement sought to be enabled by the PPC. This is a less effective or efficient option compared to the private plan change option sought by the Requestor.

25. This report recommends **Option 1** (accept the PPC request in full) as there are insufficient grounds that would warrant the rejection of the request and it is not suitable to be processed as a resource consent. Adopting the request is not a preferred option, as doing so would transfer the costs of the PPC request from the applicant to the Council and have different effects of legal weighting for the plan change. Additionally, due to the Plan Stop legislation, it would require that Council must apply for an exemption request from the Minister for the plan change to proceed.

26. The Council has received the necessary information required to make its decision under in clause 25 of the First Schedule of the RMA, and as such does not need to request additional information to decide on which option is the most appropriate.

Consultation Process | Hātepe Matapaki

Significance and Engagement | Te Whakamahi I kā Whakaaro Hiraka

27. This matter is of low significance, as determined by reference to the Council's Significance and Engagement Policy 2024 because of the lower impact regarding climate change impacts and importance to the District, while having a higher impact on community interest (especially from those in the vicinity of the PPC site).

28. The persons who are affected by or interested in this matter are the landowner, landowners of surrounding or nearby properties, iwi, and the Otago Regional Council (ORC). These parties will be notified if the PPC request is accepted.

29. The Council has not undertaken any consultation to date on this proposal since it is the Requestor's responsibility to do so. It is our understanding that the Requestor has undertaken initial consultation with property owners who will be subject to change in zoning through this Private Plan Change. If the Plan Change Request is accepted and notified, this will allow for submissions and further submissions as outlined in Schedule 1 of the RMA.

Māori Consultation | Iwi Rūnaka

30. The Council has not undertaken direct consultation with mana whenua and the Requestor states at page 8 of the s32 Report (linked in Attachment A) that no direct consultation has been undertaken with relevant Iwi Authorities and that, subject to Council acceptance, the request will be sent to Iwi Authorities for comment. If the PPC is accepted, mana whenua would also have the opportunity to make submissions and be heard as provided for by the Schedule 1 process.

Risk and Mitigations | Kā Raru Tūpono me kā Whakamaurutaka

31. This matter relates to the Strategic/Political/Reputation risk category. It is associated with RISK10056 Ineffective provision for the future planning and development needs of the district within the QLDC Risk Register. This risk has been assessed as having a moderate residual risk rating.

32. The approval of the recommended option will allow Council to retain the risk at its current level. This will be achieved by processing the PPC in accordance with the requirements of the Resource Management Act.

Financial Implications | Kā Riteka ā-Pūtea

33. The costs of the PPC have been met by the Requestor, as provided for by Part 2 of the First Schedule of the RMA. The costs would be covered by either Council or the Requestor going forward depending on the Option taken.

34. If the Council accepted the PPC, then all costs associated with it would fall to the Requestor to meet.

35. If the Council adopted the PPC, then all costs associated with it would fall to the Council to meet.

36. If the Council rejected the plan change no direct costs would be occurred however, there may be risk of costs associated with any subsequent legal action.

37. If the PPC is converted into a resource consent no costs would be incurred by the Council, however there may be risk of costs associated with any subsequent legal action.

Council Effects and Views | Kā Whakaaweawe me kā Tirohaka a te Kaunihera

38. The following Council policies, strategies and bylaws were considered:

- The Proposed District Plan
- The Queenstown Lakes Spatial Plan

39. The recommended option is consistent with the principles set out in the above policies

40. Under the Vision Beyond 2050 Community and Place from the Wellbeing Outcome Framework have been considered since the planning outcomes seek for an enabling built environment and connected communities.

41. This matter is not included in the Long Term or Annual Plan, as the proposal has been promulgated and funded by the Requestor.

Legal Considerations and Statutory Responsibilities | Ka Ture Whaiwhakaaro me kā Takohaka Waeture

42. PPC requests to the District Plan are subject to provisions of the RMA. The PPC has been prepared in accordance with the relevant provisions of that Act and sufficient information has been provided to enable the Council to make a decision, as required by clause 25 of the First Schedule of the RMA.

Local Government Act 2002 Purpose Provisions | Te Whakatureture 2002 o te Kāwanataka ā-Kiaka

43. Section 10 of the Local Government Act 2002 (LGA) states the purpose of local government is (a) to enable democratic local decision-making and action by, and on behalf of, communities; and (b) to promote the social, economic, environmental, and cultural well-being of communities in the present and for the future. Accepting the PPC would allow for members of the community to submit on the requested changes, which is consistent with Section 10(a) of the LGA.

44. The recommended option:

- Can be implemented through current funding under the Long Term Plan and Annual Plan;
- Is consistent with the Council's plans and policies; and
- Would not significantly alter the intended level of service provision for any significant activity undertaken by or on behalf of the Council or transfer the ownership or control of a strategic asset to or from the Council.

Attachments | Kā Tāpirihaka

A	See link QLDC - Private Plan Change 2 – Arrowtown South for the full PPC request, including S32 and associated expert reports and appendices. The 4 September 2026 version is the revised version that is recommended to be accepted and notified.
B	RFI Request dated 09/04/2026
C	Additional Information Request dated 05/08/2026

5 August 2026

Arrowsouth Properties Limited
C/- Scott Freeman
Southern Planning Group
PO Box 1081, Queenstown
9300

PRIVATE PLAN CHANGE REQUEST TO THE PROPOSED DISTRICT PLAN
THE ARROWTOWN SOUTH SPECIAL ZONE
REQUEST FOR ADDITIONAL INFORMATION

Tēnā koe Scott,

This request for additional information seeks to better understand the nature of the private plan change request, including its potential effects on the environment and how those effects are proposed to be managed, the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request, and the nature of any consultation undertaken. The information sought is considered appropriate to understand the actual or potential environmental effects anticipated from implementing the plan change request.

This request for additional information follows the request for further information issued by Council on 9 April 2026. The requestor provided further information to the Council on 14 July 2026, in the form of updated application documents and a covering letter. The Council has reviewed the further information provided and is now seeking additional information.

This request is made pursuant to clauses 23(2)–(4) of Schedule 1 of the RMA 1991, which outline:

(2) A local authority, within 15 working days of receiving any information under this clause, may require additional information relating to the request.

(3) A local authority may, within 20 working days of receiving a request under [clause 21](#), or, if further or additional information is sought under subclause (1) or subclause (2), within 15 working days of receiving that information, commission a report in relation to the request and shall notify the person who made the request that such a report has been commissioned.

(4) A local authority must specify in writing its reasons for requiring further or additional information or for commissioning a report under this clause.

This information request is separated into topic sections, and is formatted so that the Council first sets out the background context and reasons for the information requests, and then subsequently lists the information requests. Where internal feedback from QLDC staff has informed part of this RFI, this has been identified.

Section 32 Evaluation

Section 1.2 Consultation

The requestor's updated s32 evaluation report (s32 report) summarises the parties that the requestor has contacted as part of their consultation but does not include a summary of the feedback received or whether that feedback has been incorporated into the proposal. The s32 report also states that a full copy of the revised proposal will be sent to iwi. If feedback is received, this should be summarised alongside any changes that have been made in response to the feedback.

This information should be included in the s32 report in accordance with section 32(4A), cl 22(2) of Schedule 1, and cl 6(1)(f) of Schedule 4. This information would assist the Council to understand the environmental effects and the nature of any consultation under cl 23(1).

Section 2 Objectives of the proposal, options and examination

The proposal has been revised to apply the Suburban Residential Zone (SRZ) with a Building Restriction Area (BRA) rather than an Open Space Zone. This section and other sections of the s32 report state that the intention to apply a BRA to avoid *residential development* on the specified land.

Since the revised proposal does not seek any amendments to the current SRZ provisions, Rule 7.5.13 would apply to the land within the BRA as shown on planning maps. Rule 7.5.13 requires non-complying activity consent for *any building* located within the BRA.

Section 3 Examining whether the provisions of the proposal achieve the objectives

ODP Urban Growth Boundary (UGB)

The proposed provisions refer to amendments to the ODP, such as moving the ODP UGB. However, it is not clear what amendments are proposed, and no evaluation of the ODP has been provided.

It is also not clear why the ODP is proposed to be amended. While the proposal states it seeks to amend the UGB in the ODP.

Identification of McDonnell Road – Suburban Residential Zone

The proposed provisions for Chapter 27 in this section refer to bespoke provisions under the *McDonnell Road - Suburban Residential Zone*.

The requestor's letter dated 14 July states that '*it would be appropriate to introduce an additional PDP planning map overlay to clearly articulate the land that will be subject to this bespoke policy framework*'. However, the s32 Report has not been amended to reflect this method, nor have any appendices been included to show how this overlay would be included on the PDP planning maps. Alongside updating the s32 report, this information needs to be provided so that a clear package is used for notification, if the PDP is accepted.

Proposed Objectives and Policies under Chapter 27

The following updated bespoke objective and policies within Chapter 27 have been proposed by the requestor:

McDonnell Road Suburban Residential Zone

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

Policies

27.X.X.X Require a 4.5m planting strip along the McDonnell Road frontage (excluding any primary vehicular access point(s)) and a 5m planting strip along the southern boundary of the zone.

27.X.X.X Maintain existing riparian planting along the waterbody that flows through the zone.

27.X.X.X To provide on-going management of plantings, weed and pest control for any privately owned communal land.

27.X.X.X Avoid private fencing over 1.2m on boundaries of residential lots that adjoin a Council reserve containing a waterbody, the southern boundary of the zone and for any residential lot boundaries that adjoin a legal road.

27.X.X.X To require the identification of the Building Restriction Area at the time of subdivision within the zone.

27.X.X.X Avoid private vehicle crossings (and access) onto McDonnell Road from residential lots that adjoin this road.

The requestor sees that these new provisions can be implemented via the existing Restricted Discretionary Rule 27.5.7, which is:

All urban subdivision activities, unless otherwise provided for, within the following zones:

1. Suburban Residential Zone;

We do not understand how Rule 27.5.7 would require implementation of the bespoke objective and policies proposed. For instance, an 'avoid' policy cannot be effectively implemented through a broad Restricted Discretionary activity matter of discretion. To be effective, it would need a more restrictive activity status for the activity and effects that the policy is seeking to regulate (i.e. non-complying or discretionary). Therefore, the proposed provisions are neither effective nor efficient.

Additionally, the proposed bespoke objective and policies are very prescriptive and directive regarding their requirements.

We consider that it would be more appropriate to propose a bespoke rule(s) or an alternative method, such as a structure plan, as previously suggested by Council. For an example of a bespoke sub-zone and associated rules, please refer to Rule 27.7.3 – Bob's Cove Rural Residential Sub-Zone.

S32 Report s32(1)(b) assessment

The s32 Report does not adequately evaluate the efficiency and effectiveness of the provisions in achieving the objectives of the PDP. The provisions of the request are not limited to the proposed bespoke provisions; they include all provisions proposed to apply to the land, for example, the other district wide chapters and SRZ specific provisions.

Of particular concern is that the s32 Report has not undertaken an evaluation of the effectiveness and efficiency of the current Chapter 27 provisions in achieving the proposed bespoke objectives and implementing the proposed bespoke policy.

When the PPC land comes 'into the PDP', the land will not just become subject to the SRZ provisions (as amended by the private plan change), but all district wide chapters will also apply to the land. There hasn't been an assessment of any necessary changes to the district wide chapters (except for Chapter 27). The s32 Report is currently silent on the effectiveness, efficiency and appropriateness of the PDP District Wide provisions in responding to resource management issues for the PPC site, nor does it evaluate whether the PDP District Wide provisions are more appropriate than the ODP District Wide provisions.

Section 4 The risk of acting or not acting

You have not identified any risks of not acting and do not recognise any infrastructure risks, despite stating in Wastewater Infrastructure Report (Appendix P) that a deviation from the Code of Practice is required. We consider this to be a risk and ask that you consider any other additional risks that may arise.

Section 5 Evaluation of the provisions under the relevant District Plan Objectives

Amending Proposal

It is stated within this section that this proposal is an "amending proposal" because it will amend the ASSZ as contained in the ODP and also amend the partially operative PDP.

In terms of the ODP: It is not clear why the proposal is seeking to amend the ODP, other than to remove the land from the ODP. Because the ODP would fall away (and therefore not be relevant under s 32(3)(b)), Council's interpretation is that an assessment of the ODP is only needed insofar as it proposes to carry over any of the requirements from the ODP into the PDP, including as it relates to the assessment of alternative options of retention of part or all of the status quo.

In terms of the PDP: The PPC land will become subject to, not just the provisions as amended by the PPC, but also all relevant PDP district-wide chapters – objectives, policies and rules. The Council has not undertaken any s32 evaluation of the PPC land, in respect of it coming into the PDP and being subject to these district-wide chapters. Therefore, the s32 for the PPC needs to assess:

- Objectives: it is not just the proposed new McDonnell Road SRZ objective that needs to be assessed. The existing SRZ objectives also need to be assessed as appropriate for the PPC land, as do the other district-wide objectives that will apply to the PPC land (e.g. subdivision, noise, traffic). Presumably in undertaking this assessment, the requestor has concluded that the existing Chapter 27 SRZ PDP objectives are not the most appropriate way to achieve the purpose of the RMA (hence why the requestor has proposed bespoke Chapter 27 objective and policies), and that the existing Chapter 7 SRZ PDP objectives are the most appropriate and do not require amendment;
- Provisions: the same applies to provisions. When considering the district-wide chapters, the requestor needs to turn its mind to whether the PDP provisions that already exist, are the most appropriate way to achieve the relevant district-wide objectives (through following s32(1)(b)).

As a consequence of this evaluation, the requestor may conclude that other site-specific provisions are required in other PDP district-wide chapters. Information on this evaluation would assist the Council to understand the efficiency and effectiveness of the proposal, and any possible alternatives.

Servicing inconsistencies

Inconsistencies have been identified on page 36 of the s32 evaluation, which states that '*Information supplied with the Request confirms that the future residential subdivision and development of the Site can be supplied with infrastructure servicing that can meet the PDP and QLDC Code of Practice*'. However, Appendix P – Wastewater Infrastructure notes that the proposed engineering solution would result in a deviation from the Code of Practice with regard to emergency storage.

Section 6 Evaluation of the provisions under the relevant regional planning instruments

The following iwi management plans are relevant to this proposal: The Cry of the People, Te Tangi a Tauira: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan (2008) and Kāi Tahu ki Otago Natural Resource Management Plan (2005).

Information on whether/how these plans have been considered would assist the Council to understand the effects of the proposal and whether the proposal is appropriate under s32.

Section 7 Evaluation of the provisions under the national planning instruments

An assessment has not been undertaken against the National Policy Statement for Freshwater Management (NPS-FW) 2020 (consolidated with December 2025 amendments) and the National Environmental Standards for Freshwater Management (NES-FM) 2020 (version as at 15 January 2026). Since there is a watercourse that runs through the site, we would expect that an assessment is made against these higher order national planning instruments.

Note

We note that this proposal has not been assessed against any QLDC documents aside from the Housing Capacity Assessment (2025). Other Council documents, such as the Queenstown Lakes Spatial Plan Whaiora (2021) and the Parks and Open Space Strategy 2017, may help inform the proposal.

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

1. In consideration of the above comments and reasoning, please provide the below information in an updated s32 report:
 - a. A summary of the feedback received through consultation and how any feedback has been incorporated into the proposal.
 - b. Correct reference to avoiding the establishment of *any building* rather than *residential buildings* in the BRA.
 - c. If the intention is for the proposal to amend the ODP planning maps to shift the location of the UGB, please provide an evaluation in the s32 report and a map appended that shows the amendment to the ODP mapping.

- d. A method to identify the land within the McDonnell Road - Suburban Residential Zone, either through an amendment to Chapter 27 or through a mapping annotation on the Planning Maps. This method should be included in the s32 report and plan amendments, with an appendix showing these provisions and/or mapping updates to the PDP.
- e. Given how descriptive the proposed bespoke objective and policies are for the proposed McDonnell Road – Suburban Residential Zone, confirm if it is more appropriate to include bespoke rules for their implementation.
- f. An evaluation of the effectiveness and efficiency of the current Chapter 27, provisions in achieving the proposed bespoke objectives and implementing the proposed bespoke policy.
- g. An evaluation of effectiveness, efficiency and appropriateness of the PDP District Wide provisions in responding to resource management issues for the PPC site, and evaluation of whether the PDP District Wide provisions are more appropriate than the ODP District Wide provisions.
- h. Assessment of any risks of acting that may arise as a result of this proposal, including in relation to servicing.
- i. Removal of any inconsistencies within the s32 report with regards to a suitable engineering solution that is or is not in accordance with the QLDC Code of Practice.
- j. Identification of any relevant provisions within the two aforementioned iwi management plans and discuss how their content has bearing on the resource management issues of this proposal. If there are no relevant provisions, please state this.
- k. An evaluation against the NPS-FM and NES-FM with regard to this proposal and any effects that may occur on the waterbody within the site, including how those effects can be mitigated.

Servicing

The Wastewater Infrastructure report provided by Civilised Ltd (Appendix P) states that a feasible solution for the upgrades to the Wastewater Pump Station (WWPS) would require a relaxation of the standards outlined in the Code of Practice. It further states that an agreed reduced volume would need to be determined through a detailed design process at the resource consent phase.

Another solution noted would be a consent notice registered at the time of subdivision for individual lot owners to have required emergency storage within their pump wet well.

Therefore, we sought comment from the Internal Property & Infrastructure Team and Development Engineering Team to confirm that the solutions proposed could likely be feasible at the Subdivision phase. They confirmed it is likely that servicing could be resolved at time of subdivision.

In context, the neighbouring development to the immediate west of the zone change area was also formed with low pressure connections and did not trigger WWPS upgrade. This does not address present emergency storage capacity, but even if there is no residual capacity there and additionally the added storage cannot be added within the land footprint, there are then other options for the PPC site to introduce a further pump station within their development area and then for flows to be conveyed along the same or similar alignments to existing rising mains until reaching the gravity network to the north.

Page 18 of the s32 report states that the costs of infrastructure upgrades will “potentially” be reduced by development contributions. This suggest that development contributions may be utilised to support identified necessary upgrades to enable feasibility of the development solution put forward. However, this will likely not be the case especially when such upgrades are needed just to support the development. Upgrades would likely be linked against future subdivision outcomes and developer funded.

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

2. Please confirm whether *all* costs of infrastructure upgrades may be borne by the requestor during the development contribution process.

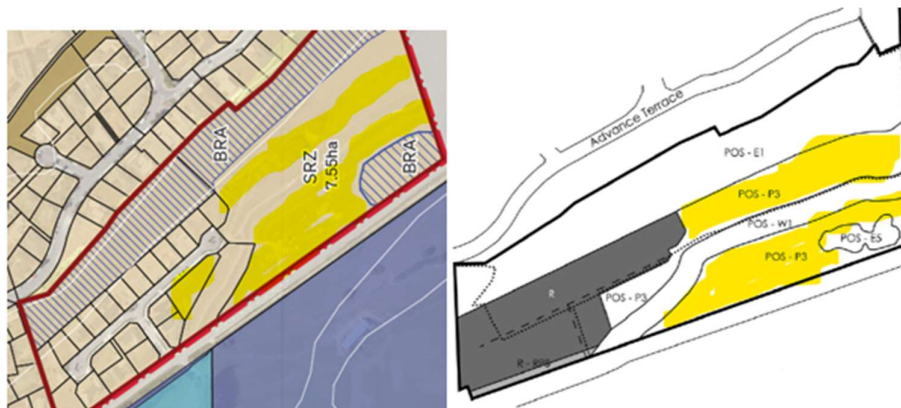
Landscape and Ecology

POS-P3

Within the RFI response letter to point 6(b) it was stated that:

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

The s32 does not explain why residential development is appropriate in all of the POS-P3 pastoral private open space areas. Landscape evidence to provide an understanding of the effects of the proposal is considered necessary. In particular, information is requested in relation to why the restrictions in the ODP are no longer valid and why the PPC proposal is more appropriate than the status quo. See figures below, the yellow highlights the indicative area in POS-P3 outside the BRA:



OOSM and POSMP

The updated application confirmed that references to the current OOSM and POSMP will not be continued through a consent notice or within the bespoke provisions proposed in Chapter 27. It also states that it is not proposed to specify exact riparian strips on-site, instead relying on existing Rule 7.5.11 within the SRZ, which requires a 7m setback for buildings from water bodies.

It appears the proposed amendments to Chapter 27 below have been included to manage landscape and ecological impacts:

McDonnell Road Suburban Residential Zone

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

Policies

27.X.X.X Require a 4.5m planting strip along the McDonnell Road frontage (excluding any primary vehicular access point(s)) and a 5m planting strip along the southern boundary of the zone.

27.X.X.X Maintain existing riparian planting along the waterbody that flows through the zone.

27.X.X.X. To provide on-going management of plantings, weed and pest control for any privately owned communal land.

The provisions only state “maintain” rather than “enhance”. This drafting suggests that no further riparian planting will be required. Additionally, page 34 of the s32 report states that the site “could” be further enhanced by riparian plantings. This is contrary to the recommendations outlined in the Ecological Assessment (Appendix R), which state that further planting is required. It also does not appear to meet Objective 27.2.4.

Designed Urban Edge

The Landscape Assessment Report (Appendix L) states that protecting the rocky outcrop from built development will provide a well-defined urban edge by acting as a default gateway. This is in accordance with Policy 4.2.2.19(c) of PDP Chapter 4, which states:

Ensure that development within the Arrowsmith Urban Growth Boundary provides:

- a. a designed urban edge with landscaped gateways that promote or enhance the containment of the town within the landscape, where the development abuts the urban boundary for Arrowsmith;*

However, it has been noted that the proposed bespoke provisions in Chapter 27 do not mention ensuring that this rocky outcrop, acting as a landscaped gateway and designed urban edge, is protected.

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

3. In consideration of the above comments and reasoning, please provide the below information:
 - a. An assessment of whether it is appropriate to carry over into the PDP the existing ODP rules with regard to POS-P3 under the ASSZ, including any expert evidence demonstrating that they are no longer valid and that the change proposed is more appropriate than the status quo.
 - b. If the continuation of the existing or new OOSM and POSMP is not being proposed, consider the inclusion of proposed bespoke provisions that will suitably manage landscape and ecological effects on-site, supported by expert advice to support these new provisions.
 - c. Update the proposed bespoke provisions within Chapter 27 to ensure that the site will provide a designed urban edge with a landscaped gateway in accordance with 4.2.2.19(c) from PDP Chapter 4.

Site Access & Transport

Whilst no specific feedback or information is being requested regarding transport, we still have provided the following comments regarding the draft proposal.

The s32 report states on page 35 that there is an existing active travel route. However, the existing pedestrian routes via Brodie Avenue to Advance Terrace and via McDonnell Road have not been determined by the Council Parks and Roading teams to be suitable active travel networks. This is particularly relevant given that the Brodie Avenue footpath is a steep “grade 4” trail that requires cyclists to dismount and open a gate to access Advance Terrace.

The Transport Assessment did not consider whether the 40km/h speed limit will be extended to encompass the proposed intersection on McDonnell Road. We have sought comments from our internal Transport Team, as the Road Controlling Authority, regarding the appropriate speed limit for the proposed intersection on McDonnell Road and whether shoulder widening would be required. They also considered the safety impacts on the potential extension of Brodie Avenue, and these are also outlined below.

The Transport Team recommend extending the 40km/h speed limit on McDonnell Road since the 80km/h Speed Limit is not aligned with Safe System Speed thresholds for a Suburban Residential Zone and the most likely types of crashes that could occur at the intersection. The 40km/h speed limit would also align better with safe and appropriate speeds outlined in the One Network Framework (ONF), noting that they are in the process of updating our Code of Practice to align with the ONF.

If the Speed Management Team do not support extending the 40km/h Speed limit, then consideration could be given to using the existing Brodie Avenue intersection (since it will be a through road instead of a cul de sac) with alternative appropriate safe pedestrian access to the properties fronting McDonnell Road.

The extension of Brodie Avenue will increase traffic volumes and trigger a requirement for footpaths on both sides of the road – The existing Brodie Avenue cross section only has a footpath along one side.

Looking at the available aerial images, there might be space to allow for the necessary footpath provision (on both sides of the road) along the existing Brodie Avenue section. The extension should require footpaths on both sides of the road, fronting all properties.

It was also recommended that any footpath extension along McDonnell Road includes a front berm to allow for rubbish bin placement – the Google maps snips below show that rubbish bins are placed on the footpaths currently. A front berm would allow for a safer pedestrian environment through creating separation from the carriageway.



They confirmed the details of the intersection form can be finalised and worked through during the resource consent stage rather than the Plan Change. When preparing for the resource consent application, the designer should consider traffic volumes on McDonnell Road and the new road/access into the development to inform a suitable intersection form.

Yours sincerely, Nāku noa nā

A handwritten signature in black ink, appearing to be 'Charlotte Clark'.

Charlotte Clark

09 April 2026

Arrowsouth Properties Limited
C/- Scott Freeman
Southern Planning Group
PO Box 1081, Queenstown
9300

PRIVATE PLAN CHANGE REQUEST TO THE PROPOSED DISTRICT PLAN
THE ARROWTOWN SOUTH SPECIAL ZONE
REQUEST FOR FURTHER INFORMATION

Tēnā koe Scott,

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

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

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

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

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

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

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

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

The Council has sought some comment on the proposal with the use of consultant experts to help inform the requests for information under cl 23 of the First Schedule. When expert input has been considered, it has been stated. No formal reports were commissioned in accordance with cl 23(3) of the First Schedule.

Site Access & Transport

A consultant expert assisted the Council with an initial assessment of the Transportation effects. These have been summarised below and have helped to inform the requests for further information in accordance with cl 23 of Schedule 1.

Summary of comments received from Transport Expert

It is noted the site access is currently in a location with an 80km/h speed limit. Additionally, there is a crest and bend in the road to the south of the access location that may limit sight distance. The speed limit may also lead to a need for shoulder widening or a right turn bay. Although some of these matters could be addressed in a subdivision consent, the Application Plans indicate this access location is reasonably set.

Other commentary on Transportation effects

Under the current provisions of the Arrowtown South Special Zone (ASSZ) the Zone Standards 12.32.5.2(xiii) provide specific limits for access onto both McDonnell Road and Centennial Avenue. This is in accordance with policy 12.31.4.1.2, which seeks to minimise the number of road crossings directly accessing Centennial Avenue and McDonnell Road.

A structure plan could be considered as a suitable option, which would mimic the pattern of the development in the existing ASSZ. A rule to this effect could be put in the provisions of Chapter 27 Subdivision and Development of the Proposed District Plan (PDP), with the structure plan showing the location of the internal road and could also restrict individual vehicle crossings off McDonnell Road & Centennial Avenue. It may also be beneficial to provide more certainty to landowners on Brodie Avenue, as to whether this road will become a through-road rather than a cul-de-sac.

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

1. The following requests for information are made:
 - a. Confirm the available sight distance to the south out of the access; and
 - b. Identify whether any shoulder widening or right turn bay would be required at this access; and
 - c. Advise if it anticipated that the 40km/h speed limit will be extended to encompass the proposed intersection (should the Plan Change be approved); and
 - d. Confirm whether the road frontage to McDonnell Road will be urbanised on the same side of the road as the site? This would include extension of the footpath to the site access.

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

2. Advise if the option of inserting a structure plan in PDP Chapter 27 is a more efficient method to provide greater certainty regarding the roading layout within the Site, and connectivity to the existing roading network (these connections are indicated on the subdivision concept plans provided with the Request but are not included in the proposed

provisions). This structure plan could also identify where individual vehicle crossings off McDonnell Road and Centennial Avenue are to be restricted.

Servicing

Within Section 4.5 of the Private Plan Change (PPC) Request, the requestor determined that it would be appropriate for the solution for servicing and infrastructure to be determined at the resource consent stage rather than at the PPC stage.

The Property and Infrastructure Team generally agrees with this except for wastewater, where Council is of the view that the necessary upgrade to the Waste Water Pump Station (WWPS) should be confirmed as feasible at the PPC stage. There may also be a need for additional emergency storage at the WWPS which may not be feasible due to the size of the designated area.

Additionally, Property and Infrastructure advised that the other infrastructure, including stormwater and water supply could be determined at the resource consent and Engineering Acceptance stage.

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

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

Landscape - Riparian Planting, McDonnell Road/UGB Boundary treatment

A consultant expert assisted the Council with an initial assessment of the Landscape effects. These have been summarised below and have helped to inform the requests for further information in accordance with Cl 23 of Schedule 1.

The Landscape Assessment Report within Appendices K[1] and K[2] comments that the plan change anticipates planting along the McDonnell Road frontage and the Indicative Masterplan signals a planting width of 4.5m. It is understood that the purpose of this planting is to assist the integration of the new urban development in views from McDonnell Road, and in terms of its relationship to the rural and resort zoned land on the western side of McDonnell Road.

Summary of comments received from Landscape Expert

The peer review comments that the plan change anticipates a 7m riparian planting width on either side of the creek and includes indicative Sections, showing only one side of the creek planted to a width of 7m, with the riparian planting width on the other side of the creek reduced to 5m. However, these anticipated outcomes have not been included in the proposed provisions. It is also noted that it is commonplace in other districts (e. g. Auckland), for riparian planting widths in urban areas to be a minimum of 10m width to achieve a meaningful ecological and landscape function/benefit and accommodate a trail.

The Landscape Assessment Report comments that the plan change anticipates planting along the south boundary adjoining the ASSZ land and the Indicative Masterplan signals a planting width of 5.0m. It is understood that the purpose of this planting is to assist the integration of the new urban development in views from the adjacent land and to create a defensible edge.

The PPC Request (Page 22) advises the proposed amendments to Chapter 27 in this regard which are as follows:

McDonnell Road – Suburban Residential Zone

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

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

The PPC Request goes on to advise that it would be prudent for these matters to be shown on the plan maps but does not provide any proposed mapping in this regard.

A structure plan within PDP Chapter 27 could show the location of boundary planting along McDonnell Road and along the margins of the waterbody.

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

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

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

5. The following requests for information are made:
 - a. Advise if the bespoke provisions referred to in the PPC Request will be amended to identify specific riparian planting width requirements (as relied on in the Landscape Assessment Report) in PDP Chapter 27 and on the plan maps or a structure plan inserted in Chapter 27; and
 - b. Advise if bespoke provisions can identify specific planting width and performance outcome requirements in Chapter 27 and on the plan maps or on a structure plan inserted in Chapter 27 to achieve the intended landscape mitigation outcome and the technical reasons in support of any such specific planting width/performance outcomes; and
 - c. Advise if bespoke provisions in relation to the riparian plantings will be required to achieve appropriate CPTED outcomes (along with the ecological and landscape functions/benefits alluded to above). For example, fencing controls in relation to lots backing onto the riparian corridor; and
 - d. Advise if bespoke treatment should be expanded to address fencing controls along the McDonnell Road, southern boundary & Urban Growth Boundary to ensure an appropriate road frontage/rural zone interface. If so, please clarify the intended controls and how they would be incorporated into the PDP. If not, please explain why this is considered unnecessary; and

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

Landscape – Other

Summary of comments received from Landscape Expert

The Landscape Assessment Report, the PPC Request and the s32 Report do not consider potential adverse effects on the adjacent rural living and residential properties on McDonnell Road. They also do not consider the appropriateness of the proposed 450m² and 300m² lot size strategies from a landscape perspective, nor do the bespoke provisions referred to generally in the s32 Report provide clarity as to which density is considered by the requestor to be the most appropriate density.

Under the current ASSZ provisions (rule 12.32.3.6(ii)), buildings and any other structures (except for pest-control fencing) are a prohibited activity in the activity areas POS-P2 and POS-P3.

The PPC Request suggests that the proposed Building Restriction Areas (BRAs) could be BRA or Open Space Nature Conservation Zoning. It does not consider any other options for an alternative Open Space Sub Zoning.

The Landscape Assessment Report advises that the development enabled by the plan change will adhere to the Arrowtown Design Guidelines. This is not reflected in the PPC Request nor the s32 Report or proposed provisions.

There is no consideration of the potential cumulative effects, from a landscape perspective, with respect to the Private Plan Change 1: Hills Resort Zone.

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

6. The following requests for information are made:
 - a. Provide expert landscape comment with respect to the appropriateness of the proposed 450m and 300m lot size strategies and provide clear reasons in the s32 Report as to why each strategy is supported in this location, and whether one strategy is preferred over the other (again with clear reasons and evaluation against s32 tests, if that is the case); and
 - b. Provide expert landscape advice specifically in relation to the effects of the private plan change in relation to the existing expected plan outcome of no buildings within the POS-P2 and POS-P3 parts of the site; and
 - c. Clarify what is proposed in regard to adhering to the Arrowtown Design Guidelines; and
 - d. Provide commentary with respect to potential cumulative effects from a landscape perspective, in light of Private Plan Change 1 – The Hills Resort Zone.

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

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

7. The following requests for information are made:

- a. Advise any zoning/overlay preferences for the proposed BRA areas in this regard from an expert landscape perspective, including clear reasoning; and
- b. Advise whether a bespoke treatment should be expanded to address fencing controls adjacent BRA (or NCZ areas) to ensure an appropriate interface with McDonnell Road. If so, please clarify the intended controls and how they would be incorporated into the proposed provisions. If not, please explain why this is considered unnecessary. Again, please consider the use of a structure plan to be incorporated into Chapter 27.

Ecology

An Ecological Assessment of Indigenous Plantings has been provided by Natural Solutions for Nature Ltd as Appendix P. Within this document there were recommended Management Measures for Stage 2, including planting, pest management and sediment control.

The Ecological Assessment of Indigenous Plantings states there may be some displacement and encroachment into the riparian zone of the POS-W1 (Waterway) area. It does not provide comment on whether the 7-metre setback from this waterway is appropriate to ensure there is no ecological degradation to it.

In the Stormwater Feasibility Report, included within the Infrastructure Feasibility Report (Appendix N) outlines that two additional dry basins will likely be required to manage the stormwater run-off from the residential development. It was commented that there is “potential to plant the bases and embankments with native wetland and riparian vegetation”. However, the appropriate plantings have not been confirmed within the Ecological Assessment, PPC Request nor the s32 Report, and that these basins will not have any adverse impacts on the waterway. Additionally, the Stormwater Feasibility Report recommends ongoing maintenance activities (See section 7.3) for these basins.

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

8. The following requests for information are made:

- a. Provide a statement from a suitably qualified and experienced ecologist which confirms whether the proposed 7-metre setback for a residential development from the waterway is appropriate to prevent any ecological degradation to it; and
- b. Provide a statement from a suitably qualified and experienced ecologist which confirms what would be appropriate plantings for the proposed dry basins to manage stormwater run-off.

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

9. The following requests for information are made:
- a. If the 7-metre setback is confirmed to not be appropriate by a suitably qualified ecologist, then provide a suitable solution to address this matter; and
 - b. Advise if the Open Space Management Plan (OOSMP) and Private Open Space Management Plan (POSMP) will be updated to reflect the recommendations outlined within the Ecological Assessment of Indigenous Plantings provided by Natural Solutions for Nature Ltd; and
 - c. Advise if the OOSMP and POSMP will be updated to reflect the recommended Maintenance Activities for the two proposed dry basins outlined within Section 7.3 of the Stormwater Feasibility Report (included within the Infrastructure Feasibility Report, Appendix N), and if the design and plantings recommended by a suitably qualified ecologist will be included.

Landscape & Ecology – Private Open Space Management Plan (POOSMP) and Overarching Open Space Management Plan (OOSMP)

In the current provisions for the ASSZ in Chapter 12 of the ODP, the POOSMP and OOSMP is directly referenced under 12.32.3.2(i)-(iii) as a controlled activity to be included for Subdivisions to manage the appropriateness of the plantings, weed control and rabbit control for the area. The POOSMP and OOSMP are also referenced under 12.32.6.2 (i)-(iii) under the Assessment Matters.

The PPC Request does not propose that the POOSMP and OOSMP are referenced directly within the PDP, either within the SRZ Chapter or the Subdivision & Development Chapter 27. Instead, the PPC proposes that conditions (f) and (g) from existing Consent Notice 11585126.5 will need to be formally varied at the time of a future subdivision pursuant to Section 221 of the RMA.

Conditions (f) and (g) of the existing Consent Notice state:

(f) All private open space areas, building/fencing restrictions and landscaping maintenance areas labelled on the approved plans identified in Condition (1) of RM161093 (as varied by RM181358) prepared by C Hughes & Associates Limited shall be managed in perpetuity in accordance with the Private Open Space Management Plan and Overarching Open Space Management Plan required under Condition 22 of RM161093 (as varied by RM181358).

(g) With regard to Lot 103, all building and earthworks are prohibited within the area shown as POS-ES on the Structure Plan from the Arrowtown South Special Zone on the Operative District Plan.

Therefore, there is a reliance at the consenting phase rather than within the plan itself for the POOSMP and OOSMP to have legal weighting. There is no commentary within the PPC Request nor s32 as to whether this is an appropriate process to ensure ongoing compliance with these approved plans in order to maintain and enhance the ecological and landscape values of the zone.

Alternatively, as suggested earlier, provisions could be included in PDP Chapter 27 in the form of a structure plan and associated rules in Chapter 7 and/ or Chapter 27 which could address this matter.

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

10. The following requests for information are made:

- a. Provide reasoning as to why it has not been proposed that the POOSMP and OOSMP are directly referenced within the proposed provisions and why it was deemed to be more appropriate to vary the existing consent notice 11585126.5; and/or
- b. Alternatively, advise if it would be more appropriate to use a structure plan within Chapter 27 and associated rules to manage the ongoing plantings, weed control and rabbit control for the area, instead of reference to the POOSMP and OOSMP within the plan or a variation to the existing consent notice 11585126.5.

Urban Design

While the Urban Design assessment notes that the proposed 7 m waterbody setback will establish a riparian and open space corridor accommodating the existing lower trails, it does not adequately explain how the built form responds to this interface.

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

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

Section 32 Evaluation

Section 2.2 Objectives of the Request

As currently drafted, the PPC objectives express a pre-determined position on the appropriateness of methods to address the identified resource management issues.

Section 2.3 Options

Alternative residential zoning under the PDP has not been considered as a reasonably practicable alternative option, including the PDP Medium Density Residential Zone (MDRZ). There has also not been any consideration of the option to use the SRZ with any other bespoke provisions, in addition to the Building Restriction Areas (BRA). The s32 options analysis is silent on bespoke provisions referred to in the Private Plan Change Request document accompanying the s32 Report and appendices.

Section 2.4 Examination of the Options

The PPC Request (Page 19) advises areas of the site could be BRA or Open Space Nature Conservation Zoning (NCZ). The Section 32 Report does not consider any other options for an alternative Open Space Sub Zoning or explain why NCZ would be best suited.

There is a reliance on the areas within the BRA to be used as appropriate open spaces to provide for the community, which are both desirable and accessible. There does not appear to be any appropriate mechanisms in place to ensure that public access will be guaranteed for these areas within the BRA. Additionally, these areas have a step topography, which may not be considered as easily accessible nor a desirable area.

There are references to the notified UIV LDSR density to apply (300m²) in parts of this application, and Subdivision Concept Plans are attached to the s32 Report as Appendices G and H. However, the s32 Report does not provide analysis of bespoke density provisions in the SRZ, nor are bespoke provisions included in the PPC Request document, which includes other bespoke provisions sought to be inserted in PDP Chapter 27.

The preferred option outlined in the s32 Report should be clear that it would include bringing the land into the PDP, which would result in the PDP districtwide provisions that apply to the SRZ also applying to the Site. These provisions are not currently assessed in the s32 Report.

There is not an assessment of the bespoke provisions proposed on page 22 of the PPC Request, under Chapter 27, 27.3 within the S32 evaluation.

McDonnell Road – Suburban Residential Zone

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

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

Section 4 The risk of acting or not acting

On page 9 of the S32, it states that Option 4, the rezoning of this site to SRZ, will result in the following advantage “With suitable infrastructure upgrades, future residential development of the Site can be accommodated by existing infrastructure servicing”. These infrastructure upgrades, namely the Waste Water Pump, have not yet been confirmed as being feasible by the Property and Infrastructure Team within Council. Therefore, this could be considered as a risk of acting, whilst the Section 32 report states there are no risks of acting.

Section 5 Evaluation of the provisions under the relevant District Plan Objectives

There has not been any acknowledgement of the existing ASSZ provisions that apply to the Site, and why they are no longer appropriate for the Site, aside from a very brief assessment. Additionally, there is no mention of the PDP districtwide provisions and their level of appropriateness for the site.

Section 6 Evaluation of the provisions under the relevant regional planning instruments

An evaluation against the current Operative Otago Regional Policy Statement has not been made. On March 30th 2026 the Proposed Otago Regional Policy Statement was made fully operative since all appeals have been fully resolved.

Consultation

The s32 Report does not include a consultation section. The only reference to consultation in the s32 Report is in relation to engagement with iwi being relied upon at the resource consent stage. There is also no reference to how the owners of the balance land within the site have been engaged with.

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

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

- a. Objectives that do not refer to specific methods; and rather that describe the resource management outcomes sought by the PPC; and
- b. Within the options analysis, please provide an assessment against alternative residential zoning under the PDP; and
- c. Evaluate why the NCZ subzone was deemed to be the most appropriate alternative to the BRA out of the four sub-zones listed in Chapter 38 of the PDP; and
- d. Please outline how the areas with the BRA can be guaranteed for public access if they are kept in private ownership and can be easily accessible and desirable for the use by the local community; and
- e. Please update the S32 report for the “Risks of Acting” to include infrastructure considerations and any other potential risks; and
- f. Please update the s32 Report to include an assessment of all bespoke provisions, including a marked-up version of all relevant PDP Chapters sought by the proposal; and
- g. Provide a more fulsome evaluation of why the current ASSZ provisions in their entirety are a less appropriate option, and whether any current ASSZ provisions should be incorporated into bespoke provisions; and
- h. Provide an evaluation against the current Operative Regional Policy Statement; and
- i. Please amend the s32 to include a summary of the consultation undertaken; and
- j. Please update the s32 to respond to any changes proposed by the requestor, in response to the RFIs set out in (1) to (7) above.

Affordable Housing

The HBA says the district has a lack of housing in the affordable price bracket (this with need a ref / citation from the 2025 HBA). Per PDP provision 1.1B (which sets out the Structure of the District Plan), ODP Policy 4.10.1 Affordable and Community Housing applies to the PPC land.

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

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

Yours sincerely, Nāku noa nā

A handwritten signature in black ink, appearing to be 'Charlotte Clark', written in a cursive style.

Charlotte Clark