

South Island Office Limited (SIO)

Request for a Change to the Proposed Queenstown Lakes District Plan

Evaluation under section 32 of the Resource Management Act 1991

21 August 2026

BROWN&COMPANY
P L A N N I N G G R O U P



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1. Introduction

1.1 The Request, background and this document

South Island Office Limited (**SIO**), requests a change (the **Request**) to the Queenstown Lakes Proposed District Plan (**PDP**) to create a new Resort Zone and associated additions to the relevant District-Wide Chapters of the PDP. The land to which the Request applies is known as Corbridge Estate (**Corbridge**), at 707 Wanaka-Luggate Highway. Corbridge is located (approximately) 4.4 km southeast of Wānaka and occupies 322 ha.

DOCUMENT 1 sets out the background to and reasons for this requested Change. The amendments requested to the PDP are set out in **DOCUMENT 2**. The effects on the environment are assessed in **DOCUMENT 3**. Technical reports in support of the Request are included in **DOCUMENTS 5 – 13**.

Any change to a plan needs to be evaluated in accordance with Section 32 (**s32**) of the Resource Management 1991 (the **Act**). This document (**DOCUMENT 4**) sets out the s32 evaluation for the Change.

Section 32 states:

32 Requirements for preparing and publishing evaluation reports

- (1) An evaluation report required under this Act must—**
 - (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and**
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—**
 - (i) identifying other reasonably practicable options for achieving the objectives; and**
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and**
 - (iii) summarising the reasons for deciding on the provisions; and**
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.**
 - (2) An assessment under subsection (1)(b)(ii) must—**
 - (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—**
 - (i) economic growth that are anticipated to be provided or reduced; and**
 - (ii) employment that are anticipated to be provided or reduced; and**
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and**
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.**
- ...
- (3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—**
 - (a) the provisions and objectives of the amending proposal; and**
 - (b) the objectives of the existing proposal to the extent that those objectives—**
 - (i) are relevant to the objectives of the amending proposal; and**
 - (ii) would remain if the amending proposal were to take effect ...**

The evaluation relies on the description and other information provided in **DOCUMENT 1**, the various supporting technical reports (**DOCUMENTS 5 – 13**) and the assessment of effects on

the environment (**AEE**) (**DOCUMENT 3**), noting that the AEE relies on the supporting technical reports.

1.2 Statutory context

Corbridge is within the PDP's Rural Zone and the northeastern portion of the site, which adjoins the Mata-au Clutha, is subject to the Outstanding Natural Feature (**ONF**) classification. Part of the land is within the outer control boundary (**OCB**) of the Wanaka Airport. The site is also subject to several Upper Clutha Priority Areas and a Landscape Schedule, as follows:

- 21.23.1 Halliday Road / Corbridge Priority Area;
- 21.22.25 Mata-au Clutha River Priority Area;
- 21.23.9 Wānaka Environs Landscape Schedule¹.

The site is also subject to four live resource consents. These are:

- **RM120572** - Discretionary activity consent granted in 2013 under the Operative District Plan (**ODP**), for a 35 Lot rural lifestyle subdivision on the site, with a remaining balance lot for farming purposes. Each lot contains a residential building platform, and consent was also granted to construct ancillary buildings associated with the subdivision. The consent has not been exercised and two lapse date extensions have been granted, the first in 2022 for a period of two years (**ET120572**) and the second in 2024 to March 2029 (**ET120572.01**);
- **RM150918** - Non-complying activity consent granted in 2016 for the use of the Corbridge Woolshed as an events venue. This included a discretionary activity component to vary **RM120572** to also provide for temporary events. This consent has been exercised;
- **FT210028 and FT210157** - Consents granted in 2021 and 2022 for the use of the site as a film making studio, providing for the construction of associated facilities. The consent has not been exercised. The consents would expire in March 2029.

The subdivision consent and the Film Studio consents have not been implemented to date.

The evaluation is therefore based on a comprehensive review of the opportunities and constraints inherent to the site, and how the future use, development and protection of resources can be better given effect to in the PDP's provisions, taking into account:

- the purpose and principles of the Act;
- the relevant provisions of the national policy statements and national environmental standards;
- the relevant provisions on the regional policy statements;
- the relevant high order planning provisions of the PDP that are either settled or largely settled;

¹ It is noted that this landscape schedule has been notified but is yet to be the subject of a Decision. There are a number of submissions that seek that the schedules not be included in the PDP or request changes.

- other planning instruments including the iwi management plans.

These are addressed below.

Part 2 of the Act – purpose and principles

Section 5

The purpose of the Act is to promote the sustainable management of natural and physical resources. People and communities may use, develop and protect resources to provide for their social, economic and cultural wellbeing, provided the regulatory components of s5(2) are achieved.

Section 5(2)(a) requires that the potential of natural and physical resources to meet the reasonably foreseeable needs of future generations is sustained. Section 5(2)(b) requires that the life supporting capacity of air, water, soil, and ecosystems is safeguarded. Section 5(2)(c) requires that any adverse effects of activities on the environment are avoided, remedied or mitigated.

Section 6 – 8 Matters

Section 6 requires recognition of and provision for the following matters of national importance of relevance to this evaluation:

- (a) **the preservation of the natural character of wetlands and lakes and rivers and their margins, and the protection of them from inappropriate subdivision, use, and development:**
- (b) **the protection of outstanding natural landscapes from inappropriate subdivision, use, and development:**
- (d) **the maintenance and enhancement of public access to and along lakes**
- (e) **the relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga:**
- (h) **the management of significant risks from natural hazards.**

Section 7 requires particular regard to be had to various matters including, of relevance to this evaluation:

- (a) **kaitiakitanga:**
 - (aa) **the ethic of stewardship:**
 - (b) **the efficient use and development of natural and physical resources:**
 - (c) **the maintenance and enhancement of amenity values:**
 - (d) **intrinsic values of ecosystems:**
 - (f) **maintenance and enhancement of the quality of the environment:**
 - (g) **any finite characteristics of natural and physical resources:**
 - (h) **the protection of the habitat of trout and salmon:**
 - (j) **the benefits to be derived from the use and development of renewable energy.**

Section 8 requires that the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) are taken into account. Important features to take into account include the The Cardrona River (Ōrau) as an ara tawhito linking Lake Wakatipu to Lake Wanaka and Hawea.

National Policy Statements

National Policy Statements (**NPSs**) provide objectives, policies and methods for matters of national significance. All subsequent resource management documents, including regional policy statements, regional plans and district plans must give effect to (implement) an NPS.

The following NPSs are relevant to the Site and the future management of the Site's natural and physical resources².

NPS for Freshwater Management (NPS-FM)

The objective of the NPS-FM is to ensure that natural and physical resources are managed in a way that prioritises: first, the health and well-being of water bodies and freshwater ecosystems; second, the health needs of people (such as drinking water); and third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future³.

Of particular relevance to the Site, the NPS-FM requires that freshwater is managed to ensure that the health and well-being of degraded water bodies and freshwater ecosystems is improved, and the health and well-being of all other water bodies and freshwater ecosystems is maintained and (if communities choose) improved; and that there is no further loss of extent of natural inland wetlands, their values are protected, and their restoration is promoted⁴.

The Site contains two man-made water bodies and no wetlands or Natural Inland Wetlands.

NPS for Indigenous Biodiversity (NPS-IB)

The objective of the NPS-IB is to maintain indigenous biodiversity across Aotearoa New Zealand so that there is at least no overall loss in indigenous biodiversity; and to achieve this: through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; by recognising people and communities, including landowners, as stewards of indigenous biodiversity; by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; all while providing for the social, economic, and cultural wellbeing of people and communities now and in the future⁵.

The Site is located within a land environment on which less than 10% of the original indigenous cover remains and does not contain any Significant Natural Areas (**SNAs**). There are small patches of indigenous vegetation scattered across the Site. It is likely that avifauna and lizards are present on the Site. The indigenous biodiversity and ecological values of the Site are assessed in **DOCUMENT 6**, prepared by Wildlands Consultants.

The NPS-IB is relevant to the extent that areas of indigenous biodiversity exist, the removal of it and the meaningful potential for reinstatement and/or enhancement of remnant indigenous biodiversity within the site.

² The NSP for Electricity Networks, the NPS for Renewable Electricity Generation, the New Zealand Coastal Policy Statement, the NPS for Infrastructure 2025, and the NPS for Greenhouse Gas Emissions from Industrial Process Heat are not relevant to this evaluation.

³ NPS-FM, Objective at Part 2.1(1)

⁴ *ibid*, Policies 5 and 6

⁵ NPS-IB, Objective at Part 2.1(1)

NPS for Highly Productive Land (NPS-HPL)

The NPS-HPL requires that highly productive land⁶ is protected for use in land-based primary production⁷, both now and for future generations. Approximately 80% of the Site (260 ha) is classified as Land Use Capability (**LUC**) 3 and the remaining 20% (63 ha) is unclassified / other.

Clause 3.6 seeks to restrict urban rezoning of highly productive land. Clauses 3.6(1) – (4) do not apply (under Clause 3.6(6) and Clause 3.6(5) does not apply because the Resort zone is not in an urban environment. ‘Urban’ as a description of a zone, as defined by the NPS-HPL includes (in addition to types of urban zones) any special purpose zone, any open space zone, and any sport and active recreation zone.

While a Resort by definition under the PDP is not urban in character and is not “Urban Development” by definition, under the PDP’s plan architecture it is a special purpose zone (and could potentially be in part a sport and active recreation-type zone or an open space-type zone.

Clause 3.6(6) therefore provides for the rezoning of LUC 3 land for a special zone containing a Resort development.

NPS for Natural Hazards (NPS-NH)

The NPS-NH requires that natural hazard risk to people and property associated with subdivision use and development is managed using a risk-based proportionate approach⁸. It is relevant to the future planning of the Site as it applies to all activities managed under the Act, and the Otago Regional Council Natural Hazards Portal shows potential hazards for parts of the Site.

The geotechnical parameters of the Site are assessed in [DOCUMENT 8](#), prepared by Geosolve, and the matrix as required by the NPS-NH is assessed in [DOCUMENT 8](#).

National Environmental Standards

National Environmental Standards (**NESs**) are regulations which prescribe technical standards, methods, for requirements for environmental matters and land use activities. Every local authority must observe NESs. A rule may be more stringent or lenient than a NES if the NES explicitly states that. NESs must be observed and enforced by local authorities.

The NES for Assessing and Managing Contaminated Soil to Protect Human Health (**NES-CS**) is relevant as the Preliminary and Detailed Environmental Site Investigation ([DOCUMENT 13](#)) undertaken by Insight Engineering indicate that five HAIL (activities noted on the Ministry for Environment’s Hazardous Activities and Industries List) activities have occurred in various parts of the Site, while it was used for rural residential purposes, the grazing of livestock and, more recently, to grow animal feed crops.

Fertilisers, fungicides and herbicide have been applied to the Site during the growing seasons between 2021 and 2025, but assessment of the resulting concentrations confirmed that the use of agrichemicals would not result in significant risks to human health. The soil contamination

⁶ means land that has been mapped in accordance with clause 3.4 and is included in an operative regional policy statement as required by clause 3.5 (but see clause 3.5(7) for what is treated as highly productive land before the maps are included in an operative regional policy statement and clause 3.5(6) for when land is rezoned and therefore ceases to be highly productive land)

⁷ means production, from agricultural, pastoral, horticultural, or forestry activities, that is reliant on the soil resource of the land

⁸ NPS-NH, Objective at Part 2.1(1)

impacts are not considered to be a limited factor for the Request as discussed in the Preliminary and Detailed Environmental Site Investigation ([DOCUMENT 13](#)).

The NES for Detached Minor Residential Units 2025 (**NES-DMRU**) is not applicable to this Request as the proposed zoning is not a residential or rural zone under the National Planning Standards.

The NES for Freshwater (**NES-FW**) is not applicable to this Request as there are no Natural Inland Wetlands within the Site. The waterbodies existing on the Site are man-made.

National Planning Standards

The National Planning Standards support the implementation of national direction and provide a framework for standardising structure, format and content of plans and policy statements. Under s58C of the Act, the planning standards can specify a range of matters relating to the form and content of planning documents.

The Queenstown Lakes District Council has yet to fully implement the planning standards. However, aspects of the standards have been incorporated into the PDP, including elements relating to plan structure, format, and the electronic accessibility and functionality.

Relevant to this plan change, the planning standards prescribe standard zones to be used in district plans. The plan change seeks to establish a Special Zone, to reside in Part Six of the PDP, along with various other zones including the three other Resort zones.

The Part Six zones are not standard zones under the planning standards. However, the planning standards provide for 'special purpose zones' where the proposed land use activities meet all of the following criteria:

- (a) are significant to the district, region or country;
- (b) are impractical to be managed through another zone;
- (c) are impractical to be managed through a combination of spatial layers.

These tests are achieved for the proposed Corbridge Resort Zone because:

- (a) The land use activities promoted in the Resort directly support the economic and tourism functions of the District given its proximity to Wanaka and the established and growing golf destination role of the Queenstown-Lakes District;
- (b) Standard PDP zones are impractical for the specific activities and their spatial configuration within the site, taking into account the PDP's imperatives to manage effects on landscape values and visibility of development. A range of tools are to be used for this purpose including landscape amenity management areas (**LAMAs**); open space / no-build areas; retention of existing established vegetation; design controls for the external appearance of built development, and location, floor level RL and height limits that vary across the Zone. Further, the ecological management methods include specific setting-aside and protection of areas of high ecological value. These are all more effectively and efficiently managed under bespoke planning provisions rather than promoting significant location-specific departures from the existing standard PDP zones;
- (c) It is less efficient to try to manage the Resort activities and spatial layout of them across the Site by a combination of spatial layers including the standard PDP zones, Building Restriction Areas or other zoning mechanisms for achieving open space / no build areas,

ecological management areas, heights and floor level RLs. A structure plan is necessary, along with a very specific bespoke suite of provisions that are tailor-made for the opportunities and constraints presented by the land.

These are addressed in more detail in the s32 optioneering process in Part 2.3 below.

Accordingly, and notwithstanding that the PDP does not yet implement this aspect of the planning standards, the proposed Resort Zone meets the criteria for a Special Purpose Zone under the National Planning Standards.

Regional Policy Statements

Section 75(3)(c) of the RMA requires that a district plan must give effect to any operative Regional Policy Statement (**RPS**). Section 74(2)(a) requires that a territorial authority has regard to any proposed regional policy statement when preparing or changing a district plan.

The Otago RPS sets the direction for future management and promotion of the sustainable management of the region's natural and physical resources, as well as providing the policy context for regional plans and establishing the framework for district plans.

The Otago Regional Council (**ORC**) declared the Operative Regional Policy Statement 2019 (RPS2019) operative on 4 March 2024. Following the 2019 review of the Region's freshwater management framework and the introduction in 2020 of new national regulations, the RPS2019 was reviewed, and the Proposed Otago Regional Policy Statement 2021 (PORPS2021) was notified on 26 June 2021 (noting that the freshwater parts had immediate legal effect when notified). The ORC notified its decisions of the PORPS2021 on 30 March 2024.

Appeals have been resolved and the PORPS2021 will become operative on 9 July 2026.

The provisions of PORPS2021 particularly relevant to this evaluation are identified in **Table 1** below.

Table 1: PORPS 2021 provisions relevant to the proposal.

Provision	Detail
MW-O1 – Principles of Te Tiriti o Waitangi	The principles of Te Tiriti o Waitangi are given effect in resource management processes and decisions, utilising a partnership approach between councils and papatipu rūnaka to ensure that what is valued by mana whenua is actively protected in the region.
IM-O1 – Long term vision (mō tatou, ā, mō kā uri ā muri ake nei)	The management of natural and physical resources, by and for the people of Otago, in partnership with Kāi Tahu, achieves a healthy and resilient natural environment, including the ecosystem services it provides and supports the well-being of present and future generations.
IM-O3 – Sustainable impact	Otago's communities provide for their social, economic, and cultural well-being by using, developing or protecting natural and physical resources in ways that support or restore the life-supporting capacities of air, water, soil, and ecosystems for future generations.
IM-P11 – Management of natural and physical resources	When preparing regional plans and district plans, recognise and provide for the role and use of natural and physical resources in a way or at a rate that supports the social, cultural and economic well-being of Otago's communities now and in the future.

Provision	Detail
LF-WAI-O1 – Te Mana o te Wai	Otago's water bodies and their health and well-being are protected, and restored or improved where they are degraded, so that the mauri of those water bodies is protected, and the management of land and water recognises and reflects that: (1) water is the foundation and source of all life – nā te wai ko te hauora o kā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future, (3) each water body has a unique whakapapa and characteristics, (4) fresh water, land, and coastal water have a connectedness that supports and perpetuates life, (5) protecting the health and well-being of water protects the wider environment, (6) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care, and attention over wai and all the life it supports, and (7) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.
LF-WAI-P3 – Integrated management/ki uta ki tai	Manage the use of fresh water and land, using an integrated approach that is consistent with tikaka and kawa, that: (1) sustains and, to the greatest extent practicable, restores or improves: (a) the natural connections and interactions between water bodies (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral), (b) the natural connections and interactions between land and water, from the mountains to the sea, (c) the habitats of mahika kai and indigenous species, including taoka species associated with the water bodies, (2) manages the effects of the use and development of land to maintain or enhance the health and wellbeing of freshwater, coastal water and associated ecosystems, (3) encourages the coordination and sequencing of regional or urban growth to ensure it is sustainable, (4) has regard to foreseeable climate change risks, and the potential effects of climate change on water bodies, including on their natural functioning, (5) has regard to cumulative effects, and (6) applies a precautionary approach where there is limited available information or uncertainty about potential adverse effects, in accordance with IM-P6.
LF-FW-P16 – Stormwater discharges	Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by: (1) requiring: (a) integrated catchment management plans for management of stormwater in urban areas, (b) all stormwater to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in the same or improved outcomes for fresh water, (c) implementation of methods to progressively reduce unintentional stormwater inflows to wastewater systems, (d) that any stormwater discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and

Provision	Detail
	(e) the use of water sensitive design techniques wherever practicable, and (2) promoting the reticulation of stormwater in urban areas where appropriate, and (3) promoting source control as a method for reducing contaminants in discharges and the use of good practice guidelines for managing stormwater.
LF-FW-M6 – District plans	Territorial authorities must prepare or amend and maintain their district plans to: (1) ... (2) ... (3) include provisions to preserve the natural character of lakes and rivers and their margins from the adverse effects of land use and development and activities on the surface of water, (4) require, wherever practicable, the adoption of water sensitive design techniques when managing the subdivision, use or development of land, and (5) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to: (a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it, (b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network, (c) encourage on-site storage of rainfall to detain peak stormwater flows, and (d) promote the use of permeable surfaces.
EIT-INF-O3 – Protecting <i>infrastructure</i> with national or regional significance	<i>Regionally significant infrastructure</i> and <i>nationally significant infrastructure</i> are not compromised by subdivision, use and development.
HAZ-NH-O1 – Natural hazards	Activities do not exacerbate natural hazard risks within Otago, and are managed to reduce significant natural hazard risk.
NFL-O1 – Outstanding natural features and landscapes	The areas and values of Otago's outstanding natural features and landscapes are identified, and the use and development of Otago's <i>natural and physical resources</i> results in the protection of them from inappropriate <i>subdivision</i> , use and development.
NFL-O2 – <i>Highly valued natural features and landscapes</i>	The identified values of any <i>highly valued natural features and landscapes</i> are maintained or enhanced.
NFL-P2 – Protection of outstanding natural features and landscapes	Protect outstanding natural features and landscapes from inappropriate <i>subdivision</i>, use and development by: (1) maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, (2) avoiding, remedying or mitigating other adverse <i>effects</i>; and (3) managing the adverse <i>effects of infrastructure</i> on the values of outstanding natural features and landscapes in accordance with EIT-INF-P4 and EIT-INF-P9.,
NFL-P3 – Management of activities within <i>highly valued</i>	Manage adverse <i>effects of subdivision</i> , use and development within any identified <i>highly valued natural features and landscapes</i> having particular regard to the maintenance or enhancement of the values of those areas.

Provision	Detail
<i>natural features and landscapes</i>	

The PDP

While the PDP as a whole has not been made operative, parts of the PDP which were not appealed or where appeals have been resolved are treated as operative.

Part two of the PDP is the Strategy section, and includes the following chapters:

- (a) Chapter 3 (Strategic Direction);
- (b) Chapter 4 (Urban Development);
- (c) Chapter 5 (Tangata Whenua); and
- (d) Chapter 6 (Landscapes – Rural Character).

The principal role of Chapters 3 to 6 is to provide strategic direction for the more detailed provisions related to zones and specific topics contained elsewhere in the PDP. Therefore, these Strategy Chapters contain only objectives and policies, with Chapter 6 only containing policies.

Chapter 3 – Strategic Direction

Part 3.1B of the PDP states that for the purposes of plan development, the strategic objectives (**SO**) and strategic policies (**SP**) in Chapter 3 provide direction for the development of more detailed provisions contained elsewhere in the plan, and that for the purpose of plan implementation the relevant objectives of the PDP including the SOs and SPs are to be considered together and no fixed hierarchy exists between them.

The strategic objectives and policies of Chapter 3 Strategic Objectives (SO) relevant to this evaluation include the following provisions below in **Table 2**.

Table 2: Provisions of the QLDC PDP Chapter 3 relevant to the proposal.

Provision	Detail
Strategic Objectives and Policies	
SO 3.2.1	The development of a prosperous, resilient and equitable economy in the District.
SO 3.2.1.1	The significant socioeconomic benefits of well designed and appropriately located visitor industry places, facilities and services are realised across the District.
SO 3.2.1.6	Diversification of the District's economic base and creation of employment opportunities through the development of innovative and sustainable enterprises.
SO 3.2.1.7	Agricultural land uses are enabled provided those uses are consistent with: a. the protection of the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; b. the maintenance of the landscape character of Rural Character Landscapes and the maintenance or enhancement of their visual amenity values; and c. the maintenance of significant nature conservation values.

Provision	Detail
SO 3.2.1.8	Diversification of land use in rural areas beyond traditional activities, including farming is enabled provided that: - the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected; - the landscape character of Rural Character Landscapes is maintained and their amenity values are maintained or enhanced; and - significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.
SO 3.2.1.9	Community needs are met by the efficient and effective operation, maintenance, upgrade and development of infrastructure in the District.
SO 3.2.4	The distinctive natural environments and ecosystems of the District are protected.
SO 3.2.4.1	Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.
SO 3.2.4.3	The natural character of the beds and margins of the District's lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development.
SO 3.2.4.5	Public access to the natural environment is maintained or enhanced
SO 3.2.5	The retention of the District's distinctive landscapes.
SO 3.2.5.1	The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related landscape capacity are identified.
SO 3.2.5.2	Within the Rural Zone, new subdivision, use and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: - where the landscape values of Priority Areas of Outstanding Natural Features and Outstanding Natural Landscapes are specified in Schedule 21.22, those values are protected; or - where the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are not specified in Schedule 21.22, the values identified according to SP 3.3.45 are protected.
SO 3.2.5.3	In locations other than in the Rural Zone, the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected from inappropriate subdivision, use and development.
SO 3.2.5.5	Within Rural Character Landscapes, adverse effects on landscape character and visual amenity values from subdivision, use or development are anticipated and effectively managed, through policies and rules, so that: - landscape character is maintained; and - visual amenity values are maintained or enhanced.
SO 3.2.5.6	In Rural Character Landscapes, new subdivision, use and development in proximity to any Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Feature or Landscape.
SO 3.2.5.7	In Rural Character Landscapes of the Upper Clutha Basin: - Priority Areas of Rural Character Landscapes are identified; and - Associated landscape character and visual amenity values and related landscape capacity are identified.

Provision	Detail
SO 3.2.6	The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.
SO 3.2.6.1	The accessibility needs of the District's residents and communities to places, services and facilities are met.
SO 3.2.6.2	A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.
SO 3.2.6.3	The contribution that community social, recreational and cultural facilities and activities make to identity and sense of place for residents of the District is recognised and provided for through appropriate location and sound design.
Strategic Policies	
SP 3.3.1	Make provision for the visitor industry to maintain and enhance attractions, facilities and services within the Queenstown and Wānaka town centres and elsewhere within the District's urban areas and settlements at locations where this is consistent with objectives and policies for the relevant zone.
SP 3.3.2	In rural areas, provide for commercial recreation and tourism related activities that enable people to access and appreciate the District's landscapes provided that those activities are located and designed and are of a nature that: a. protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; and b. maintains the landscape character and maintains or enhances the visual amenity values of Rural Character Landscapes.
SP 3.3.20	Manage subdivision and / or development that may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins so that their life-supporting capacity is safeguarded; and natural character is maintained or enhanced as far as practicable.
SP 3.3.21	Enable continuation of existing farming activities and evolving forms of agricultural land use in rural areas except where those activities conflict with: a. protection of the landscape values of Outstanding Natural Features or Outstanding Natural Landscapes; or b. maintenance of the landscape character and maintenance or enhancement of the visual amenity values of Rural Character Landscapes.
SP 3.3.24	Provide for non-residential development (other than Regionally Significant Infrastructure) that, due to its function, needs to locate in the rural environment, through a planning framework that recognises its locational constraints, while ensuring maintenance and enhancement of the rural environment.
SP 3.3.24B	Protect Regionally Significant Infrastructure by managing the adverse effects of incompatible activities.
SP 3.3.30	Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.
SP 3.3.31	Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision, use and development where there is little capacity to absorb change.
SP 3.3.49	Avoid significant adverse effects on wāhi tūpuna within the District.
SP 3.3.50	Avoid remedy or mitigate other adverse effects on wāhi tūpuna within the District.

Provision	Detail
SP 3.3.51	Manage wāhi tūpuna within the District, including taonga species and habitats, in a culturally appropriate manner through early consultation and involvement of relevant iwi or hapū.

Chapter 4 – Urban Development

Chapter 4 provides more detailed objectives and policies for urban development and applies district wide. The policy relevant to this evaluation is included in **Table 3** below.

Table 3: Provisions of the QLDC PDP Chapter 4 relevant to the proposal.

Provision	Detail
Objectives and Policies	
4.2.1.3	Ensure that urban development is contained within the defined Urban Growth Boundaries, and that aside from urban development within existing towns and rural settlements, urban development is avoided outside of those boundaries.

Chapter 5 – Tangata Whenua

Chapter 5 provides more detailed objectives and policies for tangata whenua and applies district wide. The objectives and policies relevant to this evaluation are included in **Table 4** below.

Table 4: Provisions of the QLDC PDP Chapter 5 relevant to the proposal.

Provision	Detail
Objectives and Policies	
5.4.1	Objective – Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan Policies
5.4.1.1	Ensure that Ngāi Tahu Papatipu Rūnanga are engaged in resource management decision-making and implementation on matters that affect Ngāi Tahu values, rights and interests, in accordance with the principles of the Treaty of Waitangi.
5.4.1.3	When making resource management decisions, ensure that functions and powers are exercised in a manner that takes into account iwi management plans.

Chapter 6 – Landscapes

Chapter 6 provides more detailed policies for landscape and rural character. The policies relevant to this evaluation area included in **Table 5** below.

Table 5: Provisions of the QLDC PDP Chapter 6 relevant to the proposal.

Provision	Detail
Policies	
6.3.1.1	Categorise the Rural Zoned landscapes in the District as: a. Outstanding Natural Feature (ONF); b. Outstanding Natural Landscape (ONL); c. Rural Character Landscape (RCL)
6.3.2.1	Avoid urban development and subdivision to urban densities in the rural zones.

Provision	Detail
6.3.2.2	Ensure that the location and direction of lights does not cause excessive glare and avoids unnecessary degradation of views of the night sky and of landscape character, including of the sense of remoteness where it is an important part of that character.
6.3.2.5	Avoid indigenous vegetation clearance where it would significantly degrade the visual character and qualities of the District's distinctive landscapes.
6.3.2.6	Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape values and nature conservation values would be maintained or enhanced, particularly where the subdivision or development constitutes a change in the intensity in the land use or the retirement of productive farm land.
6.3.2.7	Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Character Landscapes in proximity to an Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Outstanding Natural Feature or Outstanding Natural Landscape.
6.3.2.8	Encourage any landscaping to be ecologically viable and consistent with the established character of the area.
6.3.3.1	Recognise that subdivision and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: a. landscape values are protected; and b. in the case of any subdivision or development, all buildings and other structures and all changes to landform or other physical changes to the appearance of land will be reasonably difficult to see from beyond the boundary of the site in question.
6.3.3.2	Ensure that the protection of Outstanding Natural Features and Outstanding Natural Landscapes includes recognition of any values relating to cultural and historic elements, geological features and matters of cultural and spiritual value to Tangata Whenua, including tōpuni and wāhi tūpuna.
6.3.3.3	For farming activities within Outstanding Natural Features and Outstanding Natural Landscapes: a. Recognise that farming activities may modify the landscape; b. Enable those activities in a way that is consistent with protecting the values of Outstanding Natural Features and Outstanding Natural Landscapes.
6.3.3.5	Maintain the open landscape character of Outstanding Natural Features and Outstanding Natural Landscapes where it is open at present.
6.3.4.1	Recognise that subdivision and development is unsuitable in many locations in Rural Character Landscapes and successful applications will need to be, on balance, consistent with the objectives and policies of the Plan.
6.3.4.3	Require that proposals for subdivisions and development for rural living in the Rural Zone: a. take into account all subdivision and development that is in existence or is consented for all land within the relevance landscape character area as at 14 May 2021; and b. assess the potential for adverse cumulative effects on the landscape character of that area and its wider landscape context.
6.3.4.4	Have particular regard to the potential adverse effects on landscape character and visual amenity values where further subdivision and development would constitute sprawl along roads.
6.3.4.5	Ensure incremental changes from subdivision and development do not degrade landscape character, or important views as a result of activities associated with

Provision	Detail
	mitigation of the visual effects of proposed development such as screen planting, mounding and earthworks.
6.3.4.8	Avoid adverse effects on visual amenity from subdivision, use and development that: - is highly visible from public places and other places which are frequented by members of the public generally (except any trail⁹ as defined in this Plan); or - forms the foreground for an Outstanding Natural Feature or Outstanding natural Landscape when viewed from public roads.
6.3.4.10	In the Upper Clutha Basin, subdivision and development maintains open landscape character where that is the existing character of the Rural Character Landscape.
6.3.4.11	Encourage development to utilise shared accesses and infrastructure, and to locate within parts of the site where it will minimise disruption to natural landforms and to rural character.

Landscape Schedules

The PDP's framework for managing landscapes is continued into Chapter 21 (Rural Zone) and the Schedule of Landscape Values (**Landscape Schedules**) which are a tool to assist with the identification of the landscape attributes and values within each Rural Zone Priority Area (**PA**). Further, the Landscape Schedules identify the landscape capacity for specified activities within the Rural Zone. The Landscape Schedules contain both factual and evaluative content that may be relevant to inform plan implementation. The Landscape Schedule for the Halliday Road Corbridge PA is contained within 21.23.2, and the notified version of the Mata-au Clutha River PA is contained within 21.22.25. The Wanaka Airport Environs Area is contained within 21.23.9 which has been notified as part of the Upper Clutha Landscape Schedules Variation **UCLS Variation**). At the time of writing the UCLS Variation was still to be heard.

The Mata-au Clutha River PA includes the Mata-au Clutha River corridor from the outlet at Lake Wanaka to the boundary with Central Otago District, up to the crest of the enclosing escarpments of the corridor. The Landscape Schedule sets out the landscape values and capacity ratings for a range of activities, that are relevant to the extent of the escarpment that is located within the Site.

The key aspects of the Halliday Road Corbridge PA are as follows:

- In the '*General Description of the Area*' there is reference to '*The rolling moraine downlands include a 322 hectare site (approximately 234 hectares of which is within the PA) to the west of Wānaka airport where a film studio and associated activities has been recently consented.*'
- In the '*Land use patterns and features*' section, there is reference to '*A 322 hectare site on the rolling moraine downlands, includes land that comprises over one third of the Halliday Road / Corbridge PA, and includes a recently consented film studio and*

⁹ Means any public access route legally created by way of a grant of easement registered after 11 December 2007 for the purpose of providing public access in favour of the Queenstown Lakes District Council, the Crown or any of its entities, and specifically excludes:

- roads, including road reserves;
- public access easements created by the process of tenure review under the Crown Pastoral Land Act; and
- public access routes over any reserve administered by Queenstown Lakes District Council, the Crown or any of its entities.

associated activities. Events such as weddings and concerts have been held at Corbridge Estate' and 'The development includes a film studio complex including sound stages, film location sets, buildings for post-production facilities, film school, screening theatre, film exhibition centre and supporting facilities along with associated infrastructure for the film studio.'

- (c) *In the 'Shared and recognised attributes and values' section, there is reference to 'Valued as part of the rural approach to Wānaka from the east on Wanaka Luggate Highway, with open views across rolling or level pasture and cropping land. This may change slightly following consented development of the film studios site; however visual amenity will be maintained.'*
- (d) *In the 'Legibility and expressiveness attributes and values' section, there is reference to 'The gently rolling open landform of the glacial till moraine, appreciated from Mount Iron and Wanaka Luggate Highway, however from the highway this appreciation may alter slightly if the consented development at the film studios site is implemented.'*
- (e) *In the 'Particularly important views to and from the area' section, there is reference to 'Highly attractive views from Wanaka Luggate Highway across open pasture or cropping land to the hills and mountainous ONL of the Upper Clutha Basin, or to rising moraine landform and shelterbelts. The highly coherent pattern of large open paddocks alternating with linear shelterbelts across the majority of the PA, together with the undulating nature of the terrain, general lack of visible dwellings and changing pasture/crop colours across the seasons add to the pleasantness and strong rural character of the views. These views may change slightly if the consented development at the film studios site is implemented, however visual amenity will be maintained' and 'Views from the summit of Mount Iron, where the panoramic vistas available to the east take in the Cardrona River, the river terraces and prominent escarpment, and the undulating pastoral moraine land and shelterbelts extending to the east. If implemented, the consented film studios site will become part of these views.'*
- (f) *In the 'Naturalness attributes and values' section, there is reference to 'Overall, there is a moderate level of naturalness, with a predominance of natural rather than built elements, but human intervention as managed farmland, rural living and following construction, the consented film studios (if implemented), will be increasingly evident.'*
- (g) *In the 'Remoteness/wildness attributes and values' section, there is reference to 'Rural tranquillity and quietness are currently experienced in those parts of the PA away from Wānaka Luggate Highway, where there are low traffic volumes and the levels of activity are consistent with working farmland, hobby farming and low-density rural living. This may alter slightly at part of the PA if the consented development at the film studios site is implemented.'*
- (h) *In the 'Aesthetic attributes and values' section, there is reference to 'Strong rural character, with large areas of open space – either pastoral or cropping – retained adjacent to Wanaka Luggate Highway, a sense of spaciousness, with existing rural living and consented film studios development generally integrated by topography and/or vegetation.'*
- (i) *With respect the Landscape Capacity, the following ratings (of relevance to the Request) are set out:*

- (i) **Commercial recreational activities**¹⁰ – **some** landscape capacity for small scale and low-key activities that are: located where they are screened from Wanaka Luggate Highway by topography or existing vegetation; designed to be of sympathetic scale, appearance, and character; integrate landscape restoration and enhancement; have a low key 'rural' character; and that maintain or enhance the PA's landscape values.
- (ii) **Visitor accommodation**¹¹ **and tourism related activities**¹² – **limited** landscape capacity for rural farmstay/visitor accommodation or tourism related activities that are: either co-located with existing development or located where they are screened from Wanaka-Luggate Highway by topography or existing vegetation; designed to be of a sympathetic scale, appearance, and character; integrate landscape restoration and enhancement; have a low key 'rural' character; and that maintain or enhance the PA's landscape values.
- (iii) **Earthworks**¹³ – **limited** landscape capacity for earthworks and **some** capacity for tracks and trails for recreational use associated with farming and rural living / visitor accommodation / commercial recreation activities, subject to protecting naturalness and expressiveness attributes and values and those activities being sympathetically designed to integrate with existing natural landform patterns.
- (iv) **Rural living**¹⁴ – **very limited** landscape capacity to absorb additional rural living without cumulative adverse effects on naturalness, aesthetic and rural character values. The rural character of the PA is vulnerable to fragmentation and domestication through rural living development, and its value as a rural edge to Wānaka/Albert Town could be undermined by increased densities of rural living on the river terraces. Any additional rural living should be set well back from roads and public trails, integrated by landform and/or existing vegetation; designed to be of a modest scale; have a 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain public views across open land.

The key aspects of the Wanaka Airport Environs Schedule are as follows:

- (a) In the '*Landforms and land types*' section, there is reference to '*The sequence of landforms includes:*'
 - a. *A clearly defined and prominent terrace riser of approximately 40m height extending along the northern edge of the area, and cutting across the eastern portion of the area, to form two distinct terraces (NB The terrace riser defines Mata-au (Clutha River) PA (ONF)).*
 - b. *A series of degradational terraces stepping down towards the river, where fluvial processes have eroded the glacial outwash gravels. Scattered rock outcrops are evident.*
 - c. *Gently rolling glacial moraine fields along the western side of the area, abutting Halliday Road/Corbridge PA (RCL).'*

¹⁰ Has the same meaning as Chapter 2.

¹¹ Has the same meaning as Chapter 2.

¹² Has the same meaning as Resort in Chapter 2.

¹³ Has the same meaning as Chapter 2.

¹⁴ Has the same meaning as rural living in Chapter 3 section 3.1B.5.

- (b) In the 'Hydrological features' section, there is reference to 'Irrigation reservoirs/ponds within the rolling moraine fields and outwash terraces, with varying levels of permanent water.'
- (c) In the 'Land use patterns and features' section, there is reference to 'Film studio development is anticipated throughout the rolling moraine landform at the western end of the area. The development will, for the most part, be screened from SH6 and the river corridor by topography and/or vegetation,' and 'Halliday Road Corbridge PA (RCL) to the northwest characterised by a mix of pastoral farming, cropping, and established rural living and visitor accommodation. Consented film studio development dominates the portion of the PA adjacent the area and extends into the western end of the area.'¹⁵
- (d) In the 'Naturalness attributes and values' section, there is reference to 'Perceptions of naturalness and of working rural character are largely maintained for people visiting the landscape, although this is undermined to some extent by the presence of the airport and associated development (effectively forming a 'cut out' within the area), pivot irrigation, infrastructure driveways, gateways, the consented film studio development and signage'¹⁶
- (e) With respect the Landscape Capacity, the following ratings (of relevance to the Request) are set out:
- (i) **Commercial recreational activities – some** landscape capacity for small-scale and low-key activities that: integrate with and complement/enhance existing commercial recreation features and the airport; are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).
 - (ii) **Visitor accommodation and tourism related activities – limited** landscape capacity for activities that are located to optimise the screening and/or filtering benefit of natural landscape elements; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate). **Extremely limited or no** landscape capacity for small-scale and low-key tourism-related activities that are: visually recessive; designed to be small scale and have a low key 'rural' character, integrate landscape restoration and enhancement (where appropriate); and enhance public access (where appropriate).
 - (iii) **Urban expansions – extremely limited or no** landscape capacity.
 - (iv) **Earthworks – limited** landscape capacity to absorb earthworks associated with trails, farming and rural living/visitor accommodation/tourism related activities that maintain naturalness and expressiveness values and integrate with existing natural landform patterns, particularly the flatness of the outwash plains and terraces.
 - (v) **Rural living – very limited** landscape capacity to absorb additional rural living without cumulative adverse effects on associative and perceptual values and

¹⁵ Subject to Submitter 46.4 Scott Edgar, Silverlight Studios. The underlined text reflects the amendments annotated in the s42A version of the Schedule, dated May 2026.

¹⁶ *ibid*.

noting the constraints associated with airport noise that applies to much of the area. The rural character of the area is vulnerable to fragmentation and 'domestication' through rural living development. Any additional rural living should be set well back from roads and public tracks; co-located with existing development; integrated by existing landform and/or existing vegetation; designed to be of a small scale and 'low-key' rural character; integrate landscape restoration and enhancement (where appropriate); enhance public access (where appropriate); and should maintain the impression of expansive rural views from public vantage points.

Iwi Management Plans

Section 74(2A) of the Act requires Council to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

The following iwi management plans are relevant to the Request: *The Cry of the People, Te Tangi a Tauria: Ngāi Tahu ki Murihiku Natural Resource and Environmental Iwi Management Plan 2008 (MNRMP 2008)*, and *Kāi Tahu ki Otago Natural Resource Management Plan 2005 (KTKO NRMP 2005)*.

Both instruments promote effective iwi participation in resource management processes.

MNRMP 2008

The relevant policies of MNRMP 2008 generally have a broader application than a District Plan or the PDP specifically but overall seek to address iwi involvement in planning processing and plan development, particularly where there may be significant effects, long-term planning implications or cumulative effects.

The key relevant provisions relate to: visual amenity values and the effects of development on these; the protection and enhancement of biodiversity values; and the maintenance and enhancement of water quality.

KTKO NRMP 2005

As with MNRMP 2008, the KTKO NRMP 2005 provisions have broad application and capture a similar range of issues. In addition, Part 10: Clutha/Mata-au Catchments Te Riu o Mata-au outlines the issues and policies for the Clutha/Mata-au Catchments. Included in this chapter is a description of some of the Kāi Tahu ki Otago values associated with the Clutha/Mata-au catchments. Part 5 further promotes the maintenance of significant cultural landscapes and their protection from inappropriate use and development.

1.3 Resource management issues

The evaluation of the appropriateness of the proposal is based upon addressing the relevant resource management issues. Based on the foregoing identification of the relevant statutory matters in the national and regional planning instruments and in the higher order PDP chapters, the following resource management issues have been identified for the Site.

- (a) Well designed and appropriately located visitor industry places and facilities including diversification of land use in rural areas can bring significant socio-economic benefits to the District;

- (b) Protection of the values of the Mata-au Clutha Outstanding Natural Feature;
- (c) Maintenance of landscape and visual amenity values across the balance of the site and the surrounding RCL;
- (d) Protection and enhancement of natural values and cultural values;
- (e) The location of the site in close proximity to Wanaka, Luggate, Wanaka Airport and the trail network along the Mata-au Clutha;
- (f) The proximity of State Highway 6 and main trunk service lines for water and wastewater;
- (g) Growth in the golf tourism sector in the District and nationwide;
- (h) Efficient use of the site's natural and physical resources, taking into account the existing agricultural use, 35-lot rural lifestyle subdivision consent and the Silverlight Studios consents;
- (i) Proximity to airport and the OCB overlaying part of the north-east area of the Corbridge land, and the need to ensure that activities are compatible with airport activities;
- (j) The classification of the site's soils under the NPS-HPL.

Addressing the resource management issues set out above will result in a more appropriate zoning regime for achieving the purpose of the Act.

2. Section 32(1)(a): the purpose of the Act, objectives of the proposal, options and evaluation

2.1 Purpose of the Act

The purpose of the Act is set out in Section 5 of the Act:

5 Purpose

- (1) ***The purpose of this Act is to promote the sustainable management of natural and physical resources.***
- (2) ***In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while —***
 - a) sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and***
 - b) safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and***
 - c) avoiding, remedying, or mitigating any adverse effects of activities on the environment.***

The purpose of the Act is to promote the sustainable management of natural and physical resources. This has an enabling component (using, developing and protecting resources to enable wellbeing) and a regulating component (sustaining the potential of resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-supporting

capacity of air, water, soil, and ecosystems; and avoiding, remedying, or mitigating any adverse effects of activities on the environment).

The purpose is given effect to by the hierarchy of national, regional and district-level planning instruments. The relevant provisions of these instruments are identified in Part 1.2 above and are addressed in more detail in Parts 5 – 7 below.

2.2 Objective of the proposal

Taking into account the purpose of the Act and the resource management issues as discussed above, SIO's overall objective is the product of a range of factors including:

- (a) The comparative lack of economic benefit from ongoing primary production of the land;
- (b) The intention to not proceed with the Silverlight studio project but recognising the significant change that that project would have had on the landscape values of the site;
- (c) The comparative inefficiency of implementing the 35-lot rural lifestyle subdivision consent, and the change that the rural lifestyle development would have on the landscape values of the site;
- (d) The growth of golf tourism in New Zealand and in particular in the Queenstown Lakes District, and the existing and growing pressure on Wanaka Golf Club and comparative lack of golf facilities in the Upper Clutha;
- (e) The natural and physical attributes of the Corbridge site including the location in close proximity to (and ease of access from) Wanaka and Wanaka Airport; the rolling topography and central water feature; and the lack of visibility of large areas in the centre of the site when viewed from public and private locations.
- (f) The intention to avoid and/or manage activities within the Resort Zone so that it is not incompatible with the airport's activities.

Based on these factors SIO's overall proposal is to use the natural and physical resources of the Corbridge site more efficiently and for greater local and regional socio-economic benefit by delivering a golf resort with golf courses, driving range and associated facilities including visitor activities and accommodation, workers' accommodation and limited residential development, while recognising and protecting the landscape and ecological values of parts of the Site.

This translates into the following objective for the Corbridge Resort Zone:

51.2.1 Objective — An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located, designed and operated to:

- (a) be subservient to and maintaining the surrounding landscape and rural context;
- (b) protect the values of the Mata-au Clutha River Outstanding Natural Feature;
- (c) protect and enhance nature conservation and cultural values; and
- (d) avoid or mitigate effects on nearby land uses and reverse sensitivity effects.

This is evaluated under s32(1)(a) as follows.

2.3 Section 32(1)(a) – options

The duty under s32(1)(a) is to examine the extent to which the objective of the proposal being evaluated is the *most appropriate way to achieve the purpose of the Act*. In determining whether the objective of the proposal is the most appropriate, it is necessary to compare the objective to other potential options. In this case there are three high-level options to be examined:

- Option 1: Promoting a resort development** – including by way of a plan change request or through consenting under the RMA or Fast-Track processes.
- Option 2: The status quo** – the current Rural Zone provisions, which would retain the rural use of the site (unless consents are obtained for other activities, which is included as part of Option 1 and Option 3) and implementing the existing 35-lot rural living subdivision consent;
- Option 3: Use the land for other rural activities** – by either rezoning to other existing PDP zonings including for example the Rural Residential or Rural Lifestyle Zones, Rural Industrial Sub-Zone, or the Open Space and Recreation Zones; or via consenting processes.

Other options were considered and discounted as follows:

- (a) Exercising the existing Silverlight Studios consent was discounted because it is outside SIO's business interests and SIO is not interested in pursuing that development in whole or in part. In any case, the Silverlight consents, granted under the Covid-19 Recovery (Fast-track Consenting) Act 2020, were issued to Silverlight Studio Limited specifically and SIO would need acquire Silverlight in order to exercise those consents which it has no interest in doing. This does not apply in relation to the consent for the temporary sound stages which were issued under the RMA;
- (b) Rezoning or seeking consents for urban residential, business/commercial or industrial-type activities were all discounted because they are urban activities outside the UGB and would therefore be contrary to the higher order provisions of Chapters 3 and 4 of the PDP; and in any case would not be appropriate in this location at this time or in the reasonably foreseeable future;
- (c) The Rural Visitor Zone was discounted as this has already been addressed in Stage 3 of the PDP review by the preceding landowner. A submission sought to rezone the site to the Rural Visitor Zone (**RVZ**) to support increasing rural visitor demand. The submission included a Structure Plan.

The submission was rejected based on the proposed nature and scale of the development overreaching several objectives of the RVZ - including the small scale and low intensity of commercial activities in rural locations and exclusion of general residential activity.

The IHP report concluded that *a stand-alone 'Resort' zone would ... be in scope and overcome the inconsistencies we have identified with the objectives and policies of Chapter 46; and that the RZ best upholds the landscape character of the rural area*¹⁷.

¹⁷ QLDC: Hearing of Submissions on Stage 3 PDP: Report and Recommendations of Independent Commissioners, Report 20.7 Rural Visitor Zone.

2.4 Section 32(1)(a) – examination of the options

Option 1: Promoting a resort development

A resort development that achieves the masterplanned outcomes (including the configuration of activities and constraints on built form including the methods for managing the effects of activities and built form on the environment) would achieve the higher order imperatives in Chapter 3 of the PDP including:

- promoting the socio-economic benefits that a resort development of this scale would provide, taking into account the economic costs and benefits of a resort development (as promoted in this proposal) are set out in the reports from Savvy Consulting (economics) ([DOCUMENT 9](#)) and The AgriBusiness Group (primary production) ([DOCUMENT 12](#)). The overall conclusion from those reports is that the resort development has significantly greater economic benefits than other activities including retaining the land for primary production;
- the diversification away from traditional rural activities;
- the enhancement of recreational and visitor activities and opportunities in the District;
- protecting and enhancing the site's nature conservation resources;
- appropriately managing effects on landscape and visual amenities, rural amenities; ecological values; and traffic and infrastructure networks.

A resort development in line with the proposal would therefore achieve the purpose of the Act by enabling economic and social wellbeing while sustaining the resources of the Corbridge site and appropriately managing effects on the environment.

Option 2: the status quo

Retaining the current Rural Zone provisions would promote the use of the site for primary production and would also include implementing the existing 35-lot rural living subdivision consent and temporary events consent.

The Rural Zone provides consenting pathways (likely discretionary and non-complying) for various other activities, potentially including resort-type activities. (This potential outcome is addressed as part of the s32(1)(b) evaluation below).

The economics assessment ([DOCUMENT 9](#)) and primary production assessment ([DOCUMENT 12](#)) conclude that retaining the land for primary production is a significantly inferior option than the resort development proposal in relation to economic benefits. The status quo option would also not directly promote the protection of nature conservation values, and the 35-lot subdivision would change much of the site from having a working rural farm character to a rural living character.

While the status quo would have significantly less economic benefits than the proposal, it would potentially generate not dissimilar effects on landscape and visual amenity values, and it would not directly promote outcomes for diversification of land use or the same extent of enhancement and protection of nature conservation values. It would therefore not be more appropriate than the proposal (Option 1) in achieving the purpose of the Act.

Option 3: use the land for other rural activities

Option 3 would include either rezoning to other existing PDP zonings or via consenting processes for the activities, including:

- The Rural Residential or Rural Lifestyle Zones. The site already has consent for a 35-lot rural living subdivision, and further rural living subdivision could be enabled by a plan change or consents;
- The Rural Industrial Sub-Zone (**RISZ**) would not require a significant land area but would likely change the landscape values of the site depending on where the RISZ development would be located. There are already two RISZ areas in the Upper Clutha – at Luggate and opposite Wanaka Airport – which are yet to be built out and there is little demand for further RISZ type zoning in the foreseeable future. In any case the RISZ would not yield any significant economic benefits in comparison with the resort proposal and would not support diversification of land use as it supports rural activities;
- The Open Space and Recreation Zones may be appropriate in rural settings but there would be no demand for such activities in the site's location (being too distant from urban areas) and in any case these zones are owned and administered by the Council and there would be little appetite for such zoning in this location.

None of these activities, whether promoted by rezoning or through consenting, would achieve the significant economic benefits that the proposal would achieve, and would have not dissimilar effects on landscape values and nature conservation values as the proposal. It would therefore not be a more appropriate option than the proposal (**Option 1**) in achieving the purpose of the Act.

Conclusion – s32(1)(a)

From the foregoing analysis, when compared with the various options that are within scope of the higher order strategic provisions of the PDP for the location of the site, the most appropriate option is **Option 1** which is the development of the site to achieve SIO's objective as set out in Part 2.2 above.

3. Sections 32(1)(b) and (c): examining the provisions of the proposal in achieving the objective

3.1 Section 32(1)(b)(i) – options for achieving the objective

The duty under s32(1)(b)(i) is to examine whether the provisions of the proposal are the most appropriate way to achieve the objective, by identifying other reasonably practicable options for achieving the objective and assessing the efficiency and effectiveness of the provisions in achieving the objective.

The conclusion from the evaluation under s32(1)(a) above is that the objective of the proposal – the use of the site for a golf-based resort – is the most appropriate way to achieve the purpose of the Act.

The options to achieve the objective of the proposal are as follows:

- (a) Change the zoning of the site from the Rural Zone to a Resort Zone;
- (b) Achieving the resort by way of one or more resource consents;

- (c) Change the zoning of the site to a series of existing PDP zones that would in combination provide for the resort activities.

The advantages and disadvantages of these options are compared below.

Achieve the resort development by way of a Resort Zone

Requesting a change to the PDP to create a new Resort Zone will have the disadvantage of the transactional costs of a private plan change. These costs however would likely be significantly less over time when compared with the consenting costs of implementing either of Options 1 or 2, as discussed above. Both of those options would likely require a series of complex resource consents, likely to be discretionary or non-complying, and would carry a high degree of risk and uncertainty in addition to the consenting costs.

A Resort Zone has the following advantages:

- (a) The bespoke resort zoning is preceded by a masterplanning exercise that takes into account and synthesises a range of relevant information about the site (geotechnical, ecological, cultural, landscape and visibility analysis, etc) and the input from golf and landscape design experts;
- (b) The masterplan approach yields a comprehensive and integrated response to the attributes of the natural and physical resources of the site and recognises the potential effects of development on these resources. The use, development and protection of these resources is then reflected in the structure plan and the associated provisions;
- (c) Any potential effects can be identified, and adequate methods for avoiding, remedying or mitigating these can be built into the structure plan (through the location of activities) and the provisions (to manage the effects of the activities in perpetuity);
- (d) A resort zone is consistent with the architecture of the PDP which already includes other resort zones that, similarly, include golf courses and a range of associated visitor facilities and activities, and limited residential development, outside the UGB, and includes bespoke site-specific policy frameworks and methods for enabling the use, development and protection of resources while providing for the s5(2)(a)–(c) matters appropriately;
- (e) The single plan change process is an efficient planning approach because it focuses all stakeholders in a single process that:
 - (i) Ascertains whether the resort is appropriate in the location and in the form proposed; and
 - (ii) establishes its form and level of acceptability of effects to be managed through permitted activity status or controlled or restricted discretionary status consenting processes, while also identifying what activities should be managed through either discretionary, non-complying or prohibited status. This reduces overall consenting burden for the project.
 - (iii) In doing so, creates certainty about the range of activities that are appropriate in the resort and their location and form, and certainty about those activities that are not appropriate and are to be avoided or discouraged;
 - (iv) Creates certainty about:
 - landscape outcomes;

- ecological protection and enhancement outcomes;
- traffic and infrastructure outcomes;
- sensitivity and reverse sensitivity outcomes;

Achieve the resort development by way of the resource consent process

Under this option the current Rural zoning and provisions would be retained, and all resort development would be subject to obtaining resource consents (including any variations to the existing 35-lot rural living consent if reconfiguration were required for compatibility with the resort layout).

This option has the advantage of not requiring a private plan change, thereby avoiding the transaction costs of the process.

This option has the following disadvantages:

- (a) The need to obtain multiple resource consents to achieve the objective of the Request. These would likely be, overall and if bundled, discretionary or non-complying applications, for the visitor accommodation, commercial and built form elements of the resort. There would be little certainty that such applications would be granted and the potential that they create plan integrity issues in the longer term;
- (b) The transaction costs associated with the applications, supporting reports and processing costs would be significant – and significantly greater overall than the transaction costs of a plan change;
- (c) While a series of consent applications could follow a sequence based on an overall masterplan that sits outside the district plan, it would be inefficient to manage the process in such a way when compared with a bespoke zoning where the structure plan is fixed, certain and understood by plan users and supported by allied provisions;
- (d) The current zoning does not specifically require the protection and enhancement of ecological values within the site. Any pre-determined and certain outcomes for the protection of landscape values or the protection and enhancement of ecological values would need to be volunteered by the applicant;
- (e) Traffic and infrastructure planning would be ad hoc and may not be able to be sequenced in line with development rollout;
- (f) Each application for an element or set of elements of the resort development would need to be assessed against the policy framework of the PDP and the regional and national instruments. Some elements may be contrary to those instruments and may be refused by the consent authority, frustrating the achievement of the overall intent of the proposal;
- (g) A single comprehensive resource consent application would require significant information (including fully worked scheme plans, architectural plans, earthworks plans and a suite of very detailed expert assessments, to resource consent levels of detail). If granted, it is likely inevitably that the details would need to be varied, by s127 applications, adding to the overall transaction costs as discussed in (a) above.

Achieving the resort by rezoning the site to a combination of existing PDP zones

Utilising existing PDP Zones would have the advantage of not requiring a further special zone in the PDP. The existing zones are known, with their own policy frameworks and suite of provisions that have already been determined to be consistent with the higher order PDP provisions, and hence the purpose of the Act, in their existing locations.

However, using existing PDP zones to achieve the resort activities on the site has the following disadvantages:

- (a) While a particular existing zone may enable one or more of the resort activities (such as a hotel or club house) in combination they may not be a good fit side by side, because they would likely enable more, or less, activities than are desired for the resort environment. To make these zones more suited to the resort development they would likely require a significant number of site-specific provisions to be inserted, and the overall outcome would be a mosaic of spot zones;
- (b) This would be inconsistent with the established architecture of the PDP, which already provides for special zones, including several Resort zones. In these existing instances there are site attributes and the specific requirements of the development proposed that demand a site-specific, bespoke outcome that could not be easily achieved by a series of spot zones co-existing side-by-side;
- (c) Some of the zones may of necessity be those in Part Three of the PDP (urban environment), such as the Business Mixed Use Zone to accommodate the hotel or golf clubhouse, hospitality, and other commercial components of the Request, or an urban residential zone to accommodate the higher density visitor accommodation or residential development common in resort developments. Chapters 3 and 4 seek to avoid Urban Development outside of the UGBs and therefore the use of any urban zones would be contrary to the higher order provisions of the PDP;
- (d) The Open Space and Recreation Zones may be appropriate for the open space / golf areas, but these zones are currently confined to reserve land, typically vested in and owned by or otherwise controlled by the Council;
- (e) The Rural Living Zones (rural residential and rural lifestyle) would be appropriate for some of the resort development but would not suit higher density visitor accommodation / residential development associated with the hotel and golf functions of the resort;
- (f) The Rural Visitor Zone could suit some (but not all) elements of the resort development and could form part of the mosaic of zones for the resort but this zoning was rejected during the Stage 3 PDP process, including for the reason that a comprehensive resort zoning would be a better planning method for the site (as discussed in Part 2.3 above);
- (g) The combination of the Rural Visitor Zone, the Rural Living Zones (rural lifestyle and rural residential) and an Open Space and Recreation Zone would be the only potentially feasible combination, taking into account existing plan architecture and avoiding urban zones, but these zones would not enable the full complement of resort activities, as discussed above and may necessitate many additional resource consents for discretionary or non-complying activities;

Summary – s32(1)(b)(i)

Endeavouring to deliver a resort by way of one or more resource consents would be very costly, would create a high administrative burden and would lack certainty and not achieve integrated management of the site.

Utilising a combination of existing PDP zones would not deliver the full range of resort activities and would result in a mosaic of spot zones side by side that could enable a wide range of activities not otherwise sought to be provided in the resort. This option would also likely result in a high number of discretionary or non-complying consents being required because the activities enabled by the zones are not a good match for the kinds of activities typical in a golf resort.

A Resort Zone, achieved by way of a plan change, enables the comprehensive and integrated approach that focuses on the specific activities required in a golf resort, and enables effects to be properly managed. The Resort Zone approach is therefore the most appropriate way to achieve the objective of the proposal.

3.2 Section 32(1)(b)(ii) – assessing the efficiency and effectiveness of the provisions in achieving the objective of the proposal

The provisions are those set out in [DOCUMENT 2](#) – the Corbridge Resort Zone, proposed to be inserted into Part Six of the PDP, along with changes to some of the District-wide chapters.

Section 32(1)(b)(ii) requires the assessment of the efficiency and effectiveness of the provisions in achieving the objective.

The objective of the proposal is translated into the proposed Corbridge Resort Zone's key objective, which to recap is as follows:

- 51.2.1 Objective — An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located, designed and operated to:**
- (a) be subservient to and maintaining the surrounding landscape and rural context;**
 - (b) protect the values of the Mata-au Clutha River Outstanding Natural Feature;**
 - (c) protect and enhance nature conservation and cultural values; and**
 - (d) avoid or mitigate effects on nearby land uses and reverse sensitivity effects.**

Under s32(2)(a), the assessment under s32(1)(b)(ii) must identify and assess the costs and benefits of the environmental, economic, social and cultural effects anticipated from implementation of the provisions.

Provisions of the proposal

The provisions of the proposal are set out in the new provisions of the Corbridge Resort Zone Chapter and consequential additions to Chapters 25 (Earthworks), 27 (Subdivision and Development), 29 (Transport), 31 (Signage), 35 (Temporary Activities) and 36 (Noise) at [DOCUMENT 2](#).

The proposed provisions include:

- a new chapter, Chapter 51 (Corbridge Resort Zone) with an accompanying Structure Plan;
- consequential amendments to District-Wide Chapters 25 (Earthworks), 27 (Subdivision and Development), 29 (Transport), 31 (Signs), 35 (Temporary Activities) and 36 (Noise).

No changes to the following PDP Strategic and District Wide chapters are necessary. The provisions of these chapters are settled and are the most effective, efficient, and appropriate

way to manage the subject matter for the proposed new Zone.

Strategic Chapters: Chapter 2 (Definitions), Chapter 3 (Strategic Direction), Chapter 4 (Urban Development), Chapter 5 (Tangata Whenua), and Chapter 6 (Landscapes – Rural Character).

District Wide Chapters: Chapter 26 (Historic Heritage), Chapter 28 (Natural Hazards), Chapter 30 (Energy and Utilities), Chapter 32 (Protected Trees), Chapter 33 (Indigenous Vegetation and Biodiversity), Chapter 34 (Wilding Exotic Trees), Chapter 37 (Designations), Chapter 38 (Open Space and Recreation Zones), and Chapter 39 (Wāhi Tūpuna).

The provisions of the proposal are summarised as follows:

A. The addition of a new chapter, **Chapter 51 – Corbridge Resort Zone**, to the PDP including:

- (a) A purpose statement providing an overview of the Zone, and a synopsis of the following:
 - (i) The Corbridge Resort Zone Structure Plan, with activity areas, a public walkway / cycleway, and vehicle access connection to State Highway 6, and Landscape Amenity Management Areas. The eleven activity areas are:
 - **Activity Area G:** Golf, open space and farming;
 - **Activity Area C:** Clubhouse;
 - **Activity Area VA:** Visitor Accommodation;
 - **Activity Area RW:** Workers' Accommodation;
 - **Activity Area M:** Maintenance / Service;
 - **Activity Areas VAR1-15:** Visitor Accommodation / Residential;
 - **Activity Area P:** Public Amenity;
 - **Activity Area H:** Hospitality;
 - **Activity Area EC:** Ecological Protection;
 - **Activity Area LP:** Landscape Protection;
 - **Activity Area LP-E:** Landscape / Ecological Protection and Enhancement; and
 - **Activity Area L:** Lake / Irrigation.
 - (ii) The identified ecological and landscape values;
 - (iii) Landscape Amenity Management Areas (**LAMA**); and
 - (iv) Development staging.

- (b) An objective and a suite of policies. The objective is:

51.2.1 Objective — An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located, designed and operated to:

- (i) be subservient to and maintaining the surrounding landscape and rural context;
- (j) protect the values of the Mata-au Clutha River Outstanding Natural Feature; and
- (k) avoid or mitigate effects on nearby land uses and reverse sensitivity effects.

The policies' key topics are:

- (i) Structure Plan;
- (ii) Activities;
- (iii) Landscape and amenity;
- (iv) Ecology;
- (v) Cultural;
- (vi) Buildings;
- (vii) Infrastructure; and
- (viii) Staging.

- (c) Activity rules and development standards, notably including:

- (i) Enablement of activities for resort purposes (golf and golf related facilities and activities, visitor accommodation, ecological management, landscape effects management; and the disablement of activities not related to the resort purpose;
- (ii) The requirement for activities to accord with the Structure Plan (including to avoid residential development within the Outer Control Boundary (**OCB**) of Wanaka Airport) and the Activity Areas that have ecological value;
- (iii) Standards to control the form and appearance of built development and the operation of activities, to manage external effects and effects within the Zone;

B. Modification of Chapter 25 (Earthworks) to add maximum volume standards for the Corbridge Resort Zone and restrict earthworks within the Activity Areas that have ecological value;

C. Modification of Chapter 27 (Subdivision and Development) to add

- (a) location specific objectives and policies;

- (b) location specific rules relating to the subdivision of workers accommodation unit and including staging provisions to ensure that ecological enhancement measures and the resort facilities and activities precede residential development and therefore align with the PDP's Resort definition.
- D. Modification of Chapter 29 (Transport) to include a High Generating Traffic rule specific to the Corbridge Resort Zone;
- E. Modification of Chapter 31 (Signs) rules to include reference to the Corbridge Resort Zone;
- F. Modification of Chapter 35 (Temporary Activities) to add location specific objective and policy and rules;
- G. Modification of Chapter 36 (Noise) to add location specific rules and standards.

Evaluation

The duty under s32(1)(b) is to examine whether the provisions of the proposal are the most appropriate way to achieve the objectives, by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of the provisions in achieving the objectives.

Under s32(1)(c), the costs and benefits of the environmental, economic, social and cultural effects anticipated from implementation of the provisions must be identified and assessed.

Table 6 below sets out the evaluation required under section 32(1)(b) (appropriateness, efficiency and effectiveness of the provisions for achieving the objectives, and identifying other reasonably practicable options for achieving the objectives); and the evaluation required under section 32(2)(a) (costs and benefits of the provisions).

Table 6: Evaluation of proposed provisions under s32(1)(b)(iii).

Section 32(1)(b)(ii) – assessing the efficiency and effectiveness of the provisions in achieving the objectives	
Proposed Objective 51.2.1 states 51.2.1 Objective — An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located, designed and operated to: (a) be subservient to and maintaining the surrounding landscape and rural context; (b) protect the values of the Mata-au Clutha River Outstanding Natural Feature; (c) protect and enhance nature conservation and cultural values; and (d) avoid or mitigate effects on nearby land uses and reverse sensitivity effects. The objective has the following core components which are given effect to by different provisions. The components are: • “an integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity”; • “all of which are located and designed with particular regard to maintaining the surrounding landscape and rural character of the Zone and surrounding environment”; • “protecting the values of the Mata-au Clutha River Outstanding Natural Feature”; • “protecting and enhancing nature conservation values”; • “avoiding or mitigating reverse sensitivity effects on nearby land uses”. The provisions related to each of the components are summarised below and their costs, benefits, efficiency and effectiveness and appropriateness are evaluated in the table below. Proposed Objective 27.3.30 states: 27.3.30 Objective – Subdivision that is consistent with the Corbridge Resort Zone Structure Plan and is staged to ensure that ecological works, resort development and transport infrastructure are completed prior to residential development. The provisions related to this objective are summarised below and their costs, benefits, efficiency and effectiveness and appropriateness are evaluated in the table below, in the same discussion as Objective 51.2.1.	
Plan Provisions	

(a) Provisions related to: *an integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity:*

The relevant provisions include:

Policies:

Structure Plan

- 51.2.1.1 Enable the development, operation, use and maintenance of golf courses as the focal point of the Zone.
- 51.2.1.4 Require the provision of walkway and cycleway access through the Zone, linking to the Mata-au Clutha River corridor, in the location generally shown on the Structure Plan contained in Section 51.7.
- 27.3.30.1 Enable subdivision which provides for development that is located in accordance with the Corbridge Resort Zone Structure Plan within Section 27.13.

Activities

- 51.2.1.5 Provide for golf course construction and operation, and outdoor recreation, in **Activity Area G**.
- 51.2.1.6 Provide for commercial activities within **Activity Areas C, VA, and P** that are necessary to the functioning of the Resort and which complement the overall outdoor recreation and visitor destination role of the Zone, including reception, administration, retail, café, restaurants and licensed premises, and resort servicing.
- 51.2.1.7 Provide for Visitor Accommodation in a variety of forms in **Activity Areas VA** and **VAR1-15**, and avoid Visitor Accommodation in in **Activity Areas G, H, M, P, EC** and **LP-E**.
- 51.2.1.8 Provide for Residential Activity in a variety of forms in **Activity Area VAR**, Workers Accommodation in **Activity Area RW**, and limit the overall number of Residential Units in order to maintain a low average density of residential development across the Zone.
- 51.2.1.9 Avoid the establishment of Residential Units in **Activity Areas C, VA, P, M, G, H, EC, LP** and **LP-E**.
- 51.2.1.10 Provide for farming activities (other than in **Activity Area LP-E** and **EC**), and ancillary buildings for these purposes (in **Activity Area G** only).
- 51.2.1.11 Provide for service and industrial activities in Activity Area M that are related to the development, operation and maintenance of the resort.
- 51.2.1.12 Avoid any commercial and industrial activities that are not necessary to the operation of the Resort.

Staging

- 51.2.1.24 Require that development occurs in a staged manner, to ensure visitor industry activities and facilities are established in conjunction with corresponding stages of residential development.
- 51.2.1.25 Avoid establishment of residential units prior to issuing titles for residential lots.
- 27.3.30.6 Require that ecological protection and enhancement works, development of resort facilities and required transport network upgrades are completed

prior to titling of residential lots, in a staged manner.

Chapter 35 – Temporary Activities

35.2.1.13 Provide for Temporary Events in the Corbridge Resort Zone that contribute to the District's economy while ensuring that any adverse effects such as traffic and noise effects on land outside the Zone are mitigated.

Activity rules:

- Structure Plan (at 51.7);
- Rule 51.4.2 (walkway / cycleway);
- Rule 51.4.10 (buildings in **Activity Area G**);
- Rule 51.4.11 (buildings in **Activity Areas C, P, M, H, RW, VA, VAR 1 – 15**);
- Rule 51.4.12 (buildings in **Activity Areas LP, LP-E and EC**);
- Rules 51.4.13 – 51.4.22 (for residential and visitor accommodation activities within the Zone);
- Rules 51.4.23 – 51.4.29 (for commercial and recreation activities as part of the mix of visitor activities and facilities in the resort);
- Rules 51.4.30 – 51.4.39 (for other uses appropriate or inappropriate within the resort setting);
- Rule 27.7.34B (for subdivision in the Zone);
- Rule 27.7.34B.2 (for staging of development within the Zone to ensure that a Resort establishes);
- Rule 27.7.34B.4 (non-complying status for subdivision not in general accordance with the Structure Plan);
- Rule 35.4.19 (temporary golf events in the Zone).

Development standards:

- Rule 51.5.1 (requiring that development is in accordance with the Structure Plan);
- Rule 51.5.10 (total number of worker accommodation units);
- Rule 51.5.11 (total number of units in the Zone);
- Rule 51.5.12 (total number of Residential Units in the Zone);
- Rule 51.5.13 (maximum number of Visitor Accommodation / Residential Units in Activity Areas);
- Rule 51.5.14 (residential use of visitor accommodation units);
- Rule 51.5.15 (retail sales related to resort activities);

Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
There are costs arising from requiring development to meet the PDP's Resort definition, including the need to ensure that visitor activities and facilities predominate and there is limited residential activity by comparison. These costs include the inability to use the land for urban activities. These costs are acceptable, however, given the rural location and setting of the land and the Chapter 3 and 4 provisions that prevent urban development outside the UGB. Costs arise from the staging rules, whereby residential lots (which generate income) cannot be titled and sold until various resort works are completed. However, this cost is acceptable as it is inherent in achieving the Resort definition and is a central tenet PDP architecture for enabling resort development in rural areas. There is cost of the loss of productive land but this is significantly outweighed by the benefits of the resort activities and noting that the resort requires a rural location (both practically, for the land and other natural resources; and in relation to the PDP architecture).	The provisions collectively promote resort activities and a dominance of visitor-related facilities and activities (golf, golf-related facilities including clubhouse, maintenance, driving range; and hotel and related visitor accommodation facilities and activities) and by comparison limited opportunity for residential activity. The provisions achieve the Resort definition and enable the mix of activities in the rural setting. The economic benefits of this, over other activities including agricultural primary production, are addressed in DOCUMENT 9 (economics assessment) and DOCUMENT 12 (productivity assessment). Benefits of the provisions also arise from the masterplanned layout of activities within the Corbridge site, taking into account the optimal routing of golf courses, to promote a high class golfing experience; protecting and enhancing nature conservation values; protecting landscape and visual amenity values; and protecting rural character. These are coupled with the benefits of the provisions specific to landscape effects management, in the table below. The additional events enabled by the change in Chapter 35 (for temporary activities) will have social and economic benefits from the opportunity for golf tournaments that will add to the attractions available in the Upper Clutha.	The provisions are efficient and effective in that: (a) the Structure Plan clearly identifies where activities can be located and where they cannot be located; (b) the activity rules and standards provide specific parameters for building bulk, location and external appearance; (c) the standards clearly specify the expected ratios of visitor accommodation units and residential units and how visitor accommodation units can be used for residential purposes and vice-versa, to ensure the predominance of visitor facilities overall and limiting the purely residential offering within the Zone; (d) the staging rules specify what works must be completed before tranches of residential lots can be released for sale, thereby incentivising the resort development and ensuring that the development overall meets the PDP's Resort definition; (e) the temporary events provisions enable events and provide suitable timing parameters and management methods; (f) the provisions therefore result in certain outcomes. The provisions are appropriate because: (a) they are clear for plan users; (b) taking into account the costs and benefits, they will yield a new and significant destination for visitors and Upper Clutha residents and will complement the existing offering of visitor activities and facilities locally, regionally and nationally;

		(c) they will collectively create an integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, thereby according with the objective, the Resort definition and the higher order provisions and architecture of the PDP; (d) the temporary events provisions are the same as those that apply in the other golf resort zones which have been tested and are reliable for their purpose.
Provisions		
(b) Provisions related to: <i>all of which are located and designed with particular regard to maintaining the surrounding landscape and rural character of the Zone and surrounding environment:</i> and (c) <i>Protecting the values of the Mata-au Clutha River Outstanding Natural Feature:</i> The relevant provisions include: Policies: <u>Structure Plan:</u> 51.2.1.2 Require all development to be located in accordance with the Structure Plan contained in 51.7 to ensure that: (a) ... (b) Development integrates with the golf courses, the underlying topography and existing vegetation; (c) Development is located where it can be successfully absorbed, while achieving a predominance of open space and maintaining open landscape character; (d) Visibility of buildings from beyond the Zone, particularly from the State Highway and the Mata-au Clutha River corridor, is avoided or mitigated through appropriate siting, external appearance controls, and sympathetic landform modification, retention of key shelterbelts and a coordinated and cohesive planting strategy; (e) A high level of internal amenity within the Zone is achieved through careful siting of buildings, waterbodies and accessways, retention of expansive open space areas and the sympathetic landform modification and a cohesive and coordinated planting strategy; and ...		

51.2.1.3 Avoid development that is not located in accordance with the Structure Plan, where it will give rise to adverse effects on landscape character and visual amenity values.

Landscape and Amenity

51.2.1.12 Maintain the landscape character and visual amenity values of the Zone, including the values described in 51.1.3, by:

- (a) Ensuring that buildings are located only in areas where the change can be absorbed and so that a predominance of open space is achieved across the Zone.
- (b) Avoiding built development in **Activity Area LP-E**.
- (c) Avoiding built development other than small scale buildings associated with golf course operations and farming, in **Activity Areas G and LP**;
- (d) Require the establishment of LAMAs in accordance with the Structure Plan in Section 51.7 to ensure that the potential adverse effects of built form and golf course development on landscape and visual amenity values are avoided or mitigated.
- (e) Ensuring that the LAMAs integrate with the natural line and form of the topography.
- (f) Maintaining an open pastoral character in **Activity Area LP**.

Buildings

51.2.1.18 Control building height, building coverage, external materials and colours, and glare in order to:

- (a) Avoid or mitigate adverse visual effects of built form on landscape values when viewed from within and beyond the Zone; and
- (b) Ensure that built development is subservient to the landscape within the context of the Zone and wider rural environment.

51.2.1.19 Maintain landscape character by ensuring that the design of the access to the Zone, and the cycleway / walkway, are visually recessive and have a non-urban character.

Earthworks:

25.2.1.12 Avoid earthworks within **Activity Areas LP-E and EC** of the Corbridge Resort Zone unless any potential adverse effects on ecological values are avoided or effectively mitigated.

Activity rules:

- Structure Plan at 51.7, including the location of the activity areas, having been informed by the landscape input into the masterplan; the LAMA areas; and the vegetation to be retained;
- Rule 51.4.5 (retention of existing vegetation as annotated on the Structure Plan);
- Rule 51.4.7 (establishment of LAMA identified on the Structure Plan);
- Rule 51.4.11 (buildings in various activity areas, and matters of control relating to appearance of buildings and effects on visual and landscape values and

amenities of the area); • Rule 51.4.12 (non-complying status for buildings in Activity Areas LP, LP-E and EC); • Rule 27.7.34B.2 (staging of development, and requirement for LAMA to be established prior to titling of lots in activity areas the LAMA relates to); • Rule 25.4.7 (earthworks in Activity Areas EC and LP-E) Development standards: • Rules 51.5.2 – 51.5.5 (bulk and location standards for buildings); • Rule 51.5.6 (building materials and colours, including reflectivity values); • Rule 51.5.7 (standards for buildings in Activity Area G); • Rule 51.5.8 (standard for light spill);		
Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
There is cost from confining built development to the specific areas on the Structure Plan and discouraging most built development elsewhere in the Zone, based on the effect of built form on landscape and visual amenity values. There is also a cost in constraining the built envelope (through height, coverage and setback controls) and the external materials and colours of buildings. The landscape mitigation works (LAMA) mechanisms also present a cost overall. These costs are expected, however, in the Queenstown-Lakes environment where landscape values are recognised and effects on them carefully managed, as required by the higher order PDP provisions.	The benefit of the provisions relating to the location and design of the development is the ability for the zoning to proceed while maintaining the landscape character and amenity values of the Zone and surrounding environment, thereby ensuring that the Zone is consistent with and achieves the higher order provisions of Chapters 3 and 6. The benefits in turn extend to the economic benefits, ecological enhancement and public access connectivity of the Zone overall.	The provisions are efficient and effective in that: (a) the Structure Plan clearly identifies where activities can be located and where they cannot be located, and this is based on a combination of factors including golf course layout, potential visibility of built development when viewed from outside the site, and protection of ecological values; (b) the standards provide specific controls on external appearance of buildings to further avoid and mitigate effects on landscape values; (c) the standards are established in other zones (both standard PDP zones and special zones) and are appropriate and practical for the Corbridge setting; (d) the LAMA mechanism for landscape mitigation works is used in other special zones and is also appropriate and practical for the Corbridge setting, allowing earth shaping and vegetation to mitigate

		the effects of built form when viewed from external locations while integrating seamlessly with the golf environment; (e) the rules require certain existing vegetation that does or will provide a landscape mitigation function be retained is an efficient measure alongside the LAMA mechanism; (f) the provisions therefore result in certain outcomes. The provisions are appropriate because: (a) they are clear for plan users; (b) they will contribute to how the built development integrates into the landscape without unacceptable adverse effects on landscape and visual amenity values, consistent with the settled higher order provisions of the PDP; (c) they will achieve the Objective's intent relating to the location and design of development "with particular regard to maintaining the landscape character and amenity values of the Zone and surrounding environment".
Provisions		
(d) Provisions related to: <i>while protecting and enhancing nature conservation and cultural values:</i> The relevant provisions include: Policies: <u>Structure Plan:</u> 51.2.1.2 Require all development to be located in accordance with the Structure Plan contained in Section 51.7 to ensure that: (a) Ecological values are protected and enhanced; <u>Ecology</u> 51.2.1.14 Maintain and enhance the ecological values of the Mata-Au Clutha River escarpment within Activity Area LP-E by avoiding existing indigenous		

vegetation clearance, and planting of exotic species while also requiring indigenous planting and overall habitat improvement of indigenous species.

51.2.1.15Protect the values of the indigenous vegetation and avifauna, lizard and invertebrate populations within **Activity Area EC** by establishing new habitat through indigenous planting to increase the overall connectivity of indigenous vegetation and habitats.

51.2.1.16Avoid built development within **Activity Area LP-E** and **EC**.

Cultural

51.2.1.17Acknowledge the Zone's connection and proximity to the Mata-Au (Clutha River) as Wāhi Tūpuna and it's values associated to it by Manawhenua.

Infrastructure

51.2.1.20Require that development within the Zone is connected to reticulated water supply and wastewater treatment and disposal systems.

51.2.1.21Ensure a comprehensive approach to on-site stormwater management that is designed to provide sufficient capacity for anticipated development within the Zone to avoid or mitigate any potential adverse effects on natural water systems and ecological values.

51.2.1.22Encourage low impact stormwater design that utilises on-site treatment and storage and dispersal approaches.

51.2.1.23Avoid or mitigate any potential adverse effects of flooding through effective overland flow path design and control mechanisms.

Activity rules:

• Rule 51.4.3 (planting including amenity and indigenous vegetation as a permitted activity within the Zone);

• Rule 51.4.4 (requiring the establishment and implementation of the *Corbridge Resort Ecological Management Plan (CREMP)*);

• Rule 51.4.6 (removal of indigenous vegetation within **Activity Areas LP, EC** and **LP-E**);

• Rule 27.3.30.5 (requiring ecological works in **Activity Areas EC** and **LP-E**);

• Rule 27.7.34B (subdivision rule, requiring establishment and implementation of the CREMP);

• Rule 27.7.34B.2 (subdivision staging, requiring implementation of the CREMP as part of Stage 1 in the development sequence);

• Rule 25.4.7 (earthworks within **Activity Areas EC** and **LP-E** are non-complying).

Development standards:

[none applicable]

Evaluation

Costs	Benefits	Efficiency and effectiveness, appropriateness
The costs of the ecological protection and	The works required by the provisions will have,	The provisions are efficient because they require the

enhancement works as required by the provisions are the financial costs of implementing the provisions. There is some loss of habitat for some native fauna, arising from the change from farming uses to golf courses and built development. There will be a loss of approximately 0.5 hectares of indigenous shrubland and hedgerow, as well as individual indigenous plants within exotic grasslands.	overall, ecological benefits in protecting and enhancing habitat for indigenous flora and fauna in Activity Areas EC and LP-E as addressed in the ecological assessment report by Wildlands (DOCUMENT 6). Natural and cultural values are maintained and adverse effects are avoided or adequately mitigated by the methods for servicing the resort development. Water supply for potable and irrigation is sourced from existing bores with existing water rights, wastewater is to be reticulated via the Council's existing system or via onsite treatment and disposal to ground, and stormwater can be adequately managed via on-site collection, treatment and disposal to land. The Zone also enhances public access through to the Clutha River Mata-au.	protection and enhancement works within the areas that the ecological assessment has found to have values that are worth protection. The areas are identified on the Structure Plan (Activity Areas EC and LP-E, noting that Activity Area LP-E comprises the land within the Mata-Au (Clutha River) escarpment and the ONF) and development (golf courses or built development) is non-complying under the default rule for activities not otherwise provided for (Rule 51.4.39). Earthworks are non-complying within Activity Areas LP-E and EC (Rule 25.4.7). The ecological protection and enhancement works are mandated as part of Stage 1 of the staging rule (Rule 27.7.34B.2) for development of the Zone. The method of requiring the works prior to s224(c) titling of residential lots is efficient in that there is a fixed sequence of steps (from application for the CREMP under Rule 51.4.4 to full implementation under Rule 27.7.34B.2). Rule 51.4.4 requires controlled activity consent for the CREMP and the matters of control include the effectiveness of the measures proposed and the implementation and monitoring measures. The combination of rules will therefore be effective in setting aside the land areas, requiring the works as recommended by Wildlands, and ensuring that the works precede other key components of the Resort. The provisions are effective in ensuring that the methods for servicing the development will avoid or adequately mitigate any potential adverse effects on natural and cultural values. The combination of rules is therefore the most appropriate way to achieve the aspect of Objective 51.2.1 in relation to managing effects on natural and cultural values.
Provisions		

(e) Provisions related to: avoiding or mitigating reverse sensitivity effects on nearby land uses:

The relevant provisions include:

Policies:

Structure Plan

51.2.1.2 Require all development to be located in accordance with the Structure Plan contained in Section 51.7 to ensure that: ...

(f) Reverse sensitivity effects on any adjacent farming operations, the Wānaka Airport and State Highway 6 are avoided.

Activity rules:

- Structure Plan – identification of the Outer Control Boundary (**OCB**) and location of Activity Area VAR outside this contour;
- Structure Plan – location of development areas enabling visitor accommodation / residential activities;
- Rule 51.4.37 – non-complying status for the construction of new permanent water bodies (other than in **Activity Area L**);
- Rule 51.4.39 – prohibition of ASAN within the ONB;

Development standards:

[none applicable]

Evaluation

Costs	Benefits	Efficiency and effectiveness, appropriateness
The cost of requiring ASAN outside the OCB is the constraint on the masterplan and loss of opportunity for the land within the OCB for residential / visitor accommodation units. The cost of separating sensitive uses (residential / visitor accommodation units) from the highway is the loss of opportunity of using that area of land near the highway boundary, but this is a minor cost given that the separation of built development near the highway is necessary for landscape and visual amenity purposes. There are no costs arising from separating activity	The benefits are the avoidance of sensitive activities within the relevant noise environment of the airport, consistent with the standard NZS 6805:1992 <i>Airport Noise Management and Land Use Planning</i> and with the current Rural Zone provisions, and the avoidance of potential reverse sensitivity effects on airport. The benefit of separating sensitive uses (residential / visitor accommodation units) from the highway is the avoidance of potential sensitivity of those uses to noise from the highway, and the avoidance of reverse sensitivities.	The use of the OCB is an established method for managing activities at or near the interface with airports and is an efficient and effective method for avoiding sensitivity effects from airport noise and potential reverse sensitivity effects on the airport. The provisions including the use of the Structure Plan and retaining the land within the OCB for golf and open space purposes and locating activity areas that contain residential development outside the OCB, along with the rule prohibiting ASAN within the OCB, is an appropriate response to the location of the site in close proximity to the airport.

areas containing residential / visitor accommodation units from the boundaries of the adjacent Rural Zone. There is potential cost from discouraging the construction of permanent water bodies within the Site (but not including the existing large water body within the site, in Activity Area L) from the value of water hazards in golf course design.	The benefit of separating activity areas containing residential / visitor accommodation units from the boundaries of the adjacent Rural Zone is the avoidance of possible adverse interface effects between agricultural uses and residential / visitor accommodation uses, but noting that there are few agricultural activities on the land adjacent to the activity areas (Activity Areas VAR 4 and VAR 11) that could give rise to any sensitivity effects (such as spray drift) and reverse sensitivity effects. The benefit of non-complying status for permanent waterbodies within the Site (other than in Activity Area L) is the reduction of risk of attracting birds, and hence reduction of risk of birds striking aircraft taking off or landing at Wanaka Airport.	Other than units that could be used for residential and visitor accommodation purposes, no other ASAN (such as community activities) are proposed in the Zone. The use of open space to separate sensitive uses from highway noise and potentially incompatible rural activities is an established planning method and is an efficient and effective for avoiding any sensitivity / reverse sensitivity effects at these interfaces. The Structure Plan method for locating activities within the Zone and separating them from existing activities nearby is an appropriate method for the Zone. The method for mitigating the potential for bird strike is efficient and effective in that it will reduce the potential for birds to be attracted to the Site as discussed in the Ecological Assessment.
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4. The risk of acting or not acting

Section 32(2)(c) requires an evaluation of the risk of acting and risk of not acting if there is uncertain or insufficient information about the subject matter of these provisions. In this case it is considered that no such uncertainty or insufficiency exists. However, for completeness these are addressed as follows.

Risk of acting

There is no risk of acting (i.e. proceeding with this plan change) relating to the subject matter of these provisions. The provisions are sufficiently rigorous to avoid any unacceptable adverse effects on natural and physical resources, and the effects are, overall, positive.

There is a potential risk that the wastewater and water supply network upgrades (identified in Section 8.7 of [DOCUMENT 10](#)) required to service the development enabled by the proposed Zone may not be confirmed as feasible by QLDC's Property and Infrastructure Department, although given the nature of the upgrades and alternatives considered in [DOCUMENT 10](#) this risk is low.

There is a risk that legislation changes at the central government level may result in a change to the planning regime that applies to the wider District and the ongoing applicability / longevity of the provisions proposed in this Request, however this is a risk for SIO and not a risk for the Council or community at large.

Risks of not acting

The risk of not acting includes:

- (a) The loss of opportunity for a new Resort in the Wanaka area, and the benefits (including economic, ecological, recreational, public access) that arise from this zoning in this location;
- (b) The likely significant delay, uncertainty and potential lost opportunity (because of the consenting hurdles) to develop the Site and complementary resort activities and facilities, as well as the lost potential benefits arising from that, and the efficiency and effectiveness of the proposed provisions, as discussed in Part 3 above, would be foreclosed;
- (c) The loss of opportunity to enhance and protect ecological areas, including the Clutha Mata-au escarpment;

5. Evaluation of the provisions under the relevant District Plan objectives

For the purposes of section 32(3), where a proposal will amend a plan that already exists, the examination under section 32(1)(b) must relate to the provisions of the proposal and the existing PDP objectives to the extent that those objectives are relevant and would remain if the amending proposal were to take effect.

The examination must therefore address how the provisions of the proposal achieve the PDP's relevant objectives. The PDP sets out the Strategic Direction for the District through Strategic Direction in Chapters 3 to 6. These objectives are then expanded on through policies in the remaining chapters of the PDP.

The relevant objectives are those in:

- Chapter 3 (Strategic Direction);
- Chapter 6 (Landscape and Rural Character);
- Chapter 27 (Subdivision and Development);

In accordance with the definition of *Resort* in the PDP, the proposal does not constitute Urban Development and therefore Chapter 4 (Urban Development) is not relevant.

The relevant objectives are addressed in **Tables 7** and **8** below.

Table 7: Provisions of the QLDC PDP Chapter 3 relevant to the proposal.

Provision	Detail	Assessment
Strategic Objectives and Policies		
SO 3.2.1	The development of a prosperous, resilient and equitable economy in the District.	The Corbridge Resort Zone will support the prosperity and resilience of the District's visitor industry economy. Significant socioeconomics benefits will arise from the visitor industry place and facilities, as discussed in the economics assessment report (DOCUMENT 9).
SO 3.2.1.1	The significant socioeconomic benefits of well designed and appropriately located visitor industry places, facilities and services are realised across the District.	
SO 3.2.1.6	Diversification of the District's economic base and creation of employment opportunities through the development of innovative and sustainable enterprises.	The Zone will enable creation of employment opportunities during construction and when operational, within the visitor / hospitality and golf sectors. This will expand and diversify the accommodation and recreational opportunities within the Upper Clutha Basin and district more generally.
SO 3.2.1.7	Agricultural land uses are enabled provided those uses are consistent with: a. the protection of the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; b. the maintenance of the landscape character of Rural Character Landscapes and the maintenance or enhancement of their visual amenity values; and c. the maintenance of significant nature conservation values.	Agricultural land uses are enabled within the Corbridge Resort Zone, excluding Activity Areas LP-E and EC (in line with limb c. of the SO), but these will phase out as the development of the Resort progresses.
SO 3.2.1.8	Diversification of land use in rural areas beyond traditional activities, including farming is enabled provided that: a. the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected; b. the landscape character of Rural Character Landscapes is maintained and their amenity values are maintained or enhanced; and	The resort development will diversify land use in this part of the rural area while maintaining landscape values and maintaining nature conservation and cultural values.

Provision	Detail	Assessment
	c. significant nature conservation values and Ngāi Tahu values, interests and customary resources, are maintained.	
SO 3.2.1.9	Community needs are met by the efficient and effective operation, maintenance, upgrade and development of infrastructure in the District.	The Corbridge Resort Zone can be efficiently and effectively serviced as discussed in the Infrastructure Report (DOCUMENT 10).
SO 3.2.4	The distinctive natural environments and ecosystems of the District are protected.	The Ecological Assessment (DOCUMENT 6) and Landscape Assessment (DOCUMENT 7) support the Change and discusses how the amendments will maintain nature conservation values and landscape and visual amenity values, respectively.
SO 3.2.4.1	Development and land uses that sustain or enhance the life-supporting capacity of air, water, soil and ecosystems, and maintain indigenous biodiversity.	The existing ecological values within the Site and the natural character of the Clutha Mata-au margins (within the Site) will be maintained and enhanced through the provisions of the Corbridge Resort Zone and Structure Plan Activity Areas EC and LP-E.
SO 3.2.4.3	The natural character of the beds and margins of the District's lakes, rivers and wetlands is preserved, or enhanced where possible, and protected from inappropriate subdivision, use and development.	
SO 3.2.4.5	Public access to the natural environment is maintained or enhanced	
SO 3.2.5	The retention of the District's distinctive landscapes.	The values of the ONF as identified will be protected by the provisions for Activity Area LP-E.
SO 3.2.5.1	The District's Outstanding Natural Features and Outstanding Natural Landscapes and their landscape values and related landscape capacity are identified.	
SO 3.2.5.2	Within the Rural Zone, new subdivision, use and development is inappropriate on Outstanding Natural Features or in Outstanding Natural Landscapes unless: a. where the landscape values of Priority Areas of Outstanding Natural Features and Outstanding Natural Landscapes are specified in Schedule 21.22, those values are protected; or b. where the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are not specified in Schedule 21.22, the values identified according to SP 3.3.45 are protected.	

Provision	Detail	Assessment
SO 3.2.5.3	In locations other than in the Rural Zone, the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes are protected from inappropriate subdivision, use and development.	The values of the ONF will be protected through the provisions by avoiding development within it and setting development back from the ONF boundary.
SO 3.2.5.5	Within Rural Character Landscapes, adverse effects on landscape character and visual amenity values from subdivision, use or development are anticipated and effectively managed, through policies and rules, so that: c. landscape character is maintained; and d. visual amenity values are maintained or enhanced.	Any potential adverse effects on landscape character and visual amenity values have been recognised in the design process and appropriately avoided or mitigated by the Structure Plan layout and related provisions.
SO 3.2.5.6	In Rural Character Landscapes, new subdivision, use and development in proximity to any Outstanding Natural Feature or Outstanding Natural Landscape does not compromise the landscape values of that Feature or Landscape.	The values of the ONF are not compromised by the proposed development; built development is adequately separated from the ONF margin and the intervening land will be used for open space and golf.
SO 3.2.6	The District's residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.	The Corbridge Resort Zone will enable residents and the community to provide for its social, cultural and economic wellbeing by providing a golf course resort and associated facilities.
SO 3.2.6.1	The accessibility needs of the District's residents and communities to places, services and facilities are met.	
SO 3.2.6.2	A diverse, resilient and well-functioning community where opportunities for arts, culture, recreation and events are integrated into the built and natural environment.	
SO 3.2.6.3	The contribution that community social, recreational and cultural facilities and activities make to identity and sense of place for residents of the District is recognised and provided for through appropriate location and sound design.	The Corbridge Resort Zone will enable connection through to the Clutha River Mata-au and greater recreation opportunities within the Wanaka area, whilst also potentially providing for opportunities to hold future golf events.
Strategic Policies		
SP 3.3.2	In rural areas, provide for commercial recreation and tourism related activities that enable people to access and appreciate the District's landscapes provided that those activities are located and designed and are of a nature that: c. protects the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes; and d. maintains the landscape character and maintains or enhances the visual amenity values of Rural Character Landscapes.	The Corbridge Resort Zone provides for commercial recreation and tourism related activities within a rural area where people will be able to access and appreciate the surrounding landscape. The Change will maintain the landscape character and visual amenity values of the surrounding RCL, and protects the landscape values of the Clutha Mata-au ONF.

Provision	Detail	Assessment
SP 3.3.20	Manage subdivision and / or development that may have adverse effects on the natural character and nature conservation values of the District's lakes, rivers, wetlands and their beds and margins so that their life-supporting capacity is safeguarded; and natural character is maintained or enhanced as far as practicable.	The development enabled by the Zone will not adversely affect the natural character and nature conservation values of the margin of the Clutha Mata-au. As discussed above the natural character of the Clutha Mata-au margins (within the Site) will be enhanced through the provisions of the Zone and Activity Area LP-E.
SP 3.3.24	Provide for non-residential development (other than Regionally Significant Infrastructure) that, due to its function, needs to locate in the rural environment, through a planning framework that recognises its locational constraints, while ensuring maintenance and enhancement of the rural environment.	Golf resorts have a functional need to locate in the rural environment, and are able maintain and enhance the rural environment through appropriate design.
SP 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.
SP 3.3.30	Protect the landscape values of Outstanding Natural Features and Outstanding Natural Landscapes.	The Zone protects the landscape values of the Clutha Mata-au ONF and the distant ONL, through sensitive location of activities and management of the form of built development.
SP 3.3.31	Avoid adverse effects on the landscape values of the District's Outstanding Natural Features and Outstanding Natural Landscapes from residential subdivision, use and development where there is little capacity to absorb change.	
SP 3.3.49	Avoid significant adverse effects on wāhi tūpuna within the District.	The Zone does not give rise to any adverse effects on wāhi tūpuna.
SP 3.3.50	Avoid remedy or mitigate other adverse effects on wāhi tūpuna within the District.	
SP 3.3.51	Manage wāhi tūpuna within the District, including taonga species and habitats, in a culturally appropriate manner through early consultation and involvement of relevant iwi or hapū.	

Table 8: Provisions of the QLDC PDP Chapter 5 relevant to the proposal.

Provision	Detail	
Objectives and Policies		
5.4.1	Objective – Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan Policies	Consultation has been undertaken with the relevant iwi authorities. Those authorities will also be notified as part of the plan change process.
5.4.1.1	Ensure that Ngāi Tahu Papatipu Rūnanga are engaged in resource management decision-	

	making and implementation on matters that affect Ngāi Tahu values, rights and interests, in accordance with the principles of the Treaty of Waitangi.	
5.4.1.3	When making resource management decisions, ensure that functions and powers are exercised in a manner that takes into account iwi management plans.	

Chapter 6 – Landscapes

Chapter 6 provides more detailed policies for landscape and rural character. The policies relevant to this evaluation area are included in **Table 9** below.

Table 9: Provisions of the QLDC PDP Chapter 6 relevant to the proposal.

Provision	Detail	
Policies		
6.3.1.1	Categorise the Rural Zoned landscapes in the District as: a. Outstanding Natural Feature (ONF); b. Outstanding Natural Landscape (ONL); c. Rural Character Landscape (RCL)	The Site is within an RCL but the Resort zone would prevail if it is confirmed.
6.3.2.1	Avoid urban development and subdivision to urban densities in the rural zones.	The Resort zone proposed meets the definition of “Resort” and is not “Urban Development” by definition in the PDP.
6.3.2.2	Ensure that the location and direction of lights does not cause excessive glare and avoids unnecessary degradation of views of the night sky and of landscape character, including of the sense of remoteness where it is an important part of that character.	This is managed through the design and layout of the Resort and the standards governing built form (eg Rule 51.5.8, for lightspill).
6.3.2.5	Avoid indigenous vegetation clearance where it would significantly degrade the visual character and qualities of the District’s distinctive landscapes.	No indigenous vegetation clearance is necessary or proposed. The Structure Plan and provisions protect the areas where remnant indigenous vegetation remains.
6.3.2.6	Encourage subdivision and development proposals to promote indigenous biodiversity protection and regeneration where the landscape values and nature conservation values would be maintained or enhanced, particularly where the subdivision or development constitutes a change in the intensity in the land use or the retirement of productive farm land.	The Structure Plan and provisions protect the areas where remnant indigenous vegetation remains (Activity Areas EC and LP-E). The provisions include requirements to establish and implement an ecological management plan to enhance ecological values within the identified Areas
6.3.2.7	Ensure that subdivision and development in the Outstanding Natural Landscapes and Rural Character Landscapes in proximity to an Outstanding Natural Feature or Outstanding	The Structure Plan avoids change in the immediate foreground of the ONF and does not compromise any distant views

Provision	Detail	
	Natural Landscape does not compromise the landscape values of that Outstanding Natural Feature or Outstanding Natural Landscape.	of any ONF or ONL when viewed from any public or private place outside the proposed Zone.
6.3.2.8	Encourage any landscaping to be ecologically viable and consistent with the established character of the area.	Landscaping will be managed through the consenting process as development proceeds in the Zone. It will likely comprise a mix of indigenous and exotic species in accordance with the wider character of the local rural areas.
6.3.3.2	Ensure that the protection of Outstanding Natural Features and Outstanding Natural Landscapes includes recognition of any values relating to cultural and historic elements, geological features and matters of cultural and spiritual value to Tangata Whenua, including tōpuni and wāhi tūpuna.	The ONF is protected through the Structure plan and provisions' requirement for ecological protection and enhancement.
6.3.3.5	Maintain the open landscape character of Outstanding Natural Features and Outstanding Natural Landscapes where it is open at present.	The open character of the ONF is maintained by the Structure Plan and provisions.
6.3.4.1	Recognise that subdivision and development is unsuitable in many locations in Rural Character Landscapes and successful applications will need to be, on balance, consistent with the objectives and policies of the Plan.	While the Resort Zone will prevail over the RCL categorisation, the subdivision and development of the Site in accordance with the zone provisions will be consistent with the objectives and policies of the Plan regarding RCL's.
6.3.4.3	Require that proposals for subdivisions and development for rural living in the Rural Zone: a. take into account all subdivision and development that is in existence or is consented for all land within the relevance landscape character area as at 14 May 2021; and b. assess the potential for adverse cumulative effects on the landscape character of that area and its wider landscape context.	The Site is consented for 35 rural living lots and this is taken into account in the zone provisions. It is recognised that the consented lots will change the landscape values of the Site, as discussed in the landscape assessment (DOCUMENT 7).
6.3.4.4	Have particular regard to the potential adverse effects on landscape character and visual amenity values where further subdivision and development would constitute sprawl along roads.	The Structure Plan layout avoids any sprawl along the state highway.
6.3.4.5	Ensure incremental changes from subdivision and development do not degrade landscape character, or important views as a result of activities associated with mitigation of the visual effects of proposed development such as screen planting, mounding and earthworks.	The built areas are well separated from the state highway and the intervening open space land will maintain the existing rolling topography. LAMA development will be consistent with and visually indiscernible within this topography.
6.3.4.8	Avoid adverse effects on visual amenity from subdivision, use and development that:	Development will not be highly visible from public places; the Structure Plan separates new

Provision	Detail	
	a. is highly visible from public places and other places which are frequented by members of the public generally (except any trail ¹⁸ as defined in this Plan); or b. forms the foreground for an Outstanding Natural Feature or Outstanding natural Landscape when viewed from public roads.	development areas from the state highway and intervening treatment (LAMA and retention of some existing vegetation) avoid adverse effects on visual amenities.
6.3.4.10	In the Upper Clutha Basin, subdivision and development maintains open landscape character where that is the existing character of the Rural Character Landscape.	The existing open landscape character will be retained by the open space areas (Activity Area LP) around the periphery of the Zone and location of development areas where they can be absorbed by the topography.
6.3.4.11	Encourage development to utilise shared accesses and infrastructure, and to locate within parts of the site where it will minimise disruption to natural landforms and to rural character.	The Zone will rely on a single access point from the state highway.

Chapter 27 – Subdivision and Development

Chapter 27 provides more detailed policies for subdivision and development. The objectives and policies relevant to this evaluation area included in **Table 10** below.

Table 10: Provisions of the QLDC PDP Chapter 27 relevant to the proposal.

Provision	Detail	Assessment
Chapter 27 – Subdivision and Development		
27.3.21	Subdivision that provides for visitor accommodation, residential and commercial recreation activities developed consistently with the Hills Resort Zone Structure Plan.	The Change will ensure that development is able to be undertaken consistently with the Structure Plan.

In summary, the proposal is consistent with and achieves the relevant higher order provisions of the PDP.

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

The District Plan must give effect to the operative Otago Regional Policy Statement and have regard to any Proposed Regional Policy Statements. The relevant provisions of the proposed Regional Policy Statement 2021 (**pORPS21**) are assessed in **Table 11** below.

¹⁸ Means any public access route legally created by way of a grant of easement registered after 11 December 2007 for the purpose of providing public access in favour of the Queenstown Lakes District Council, the Crown or any of its entities, and specifically excludes: roads, including road reserves; public access easements created by the process of tenure review under the Crown Pastoral Land Act; and public access routes over any reserve administered by Queenstown Lakes District Council, the Crown or any of its entities.

Table 11: Evaluation of key relevant provisions of the regional planning instruments

Objective	Assessment
Proposed Regional Policy Statement 2021	
MW-O1 – Principles of Te Tiriti o Waitangi The principles of Te Tiriti o Waitangi are given effect in resource management processes and decisions, utilising a partnership approach between councils and papatipu rūnaka to ensure that what is valued by mana whenua is actively protected in the region.	SIO has engaged with Aukaha and Te Au Marama Inc since the inception of the project and continues to engage with their representatives as the masterplan, provisions and expert assessments have developed. The key considerations for this plan change are water quality and the biodiversity values of the Site, and these have been central to the masterplanning and development of provisions.
IM-O1 – Long term vision (mō tatou, ā, mō kā uri ā muri ake nei) The management of natural and physical resources, by and for the people of Otago, in partnership with Kāi Tahu, achieves a healthy and resilient natural environment, including the ecosystem services it provides and supports the well-being of present and future generations.	
IM-O3 – Sustainable impact Otago's communities provide for their social, economic, and cultural well-being in ways that support or restore environmental integrity, form, functioning, and resilience, so that the life-supporting capacities of air, water, soil, and ecosystems are sustainably managed, for future generations.	The Change is a sustainable use of the Site's resources in that the development as promoted by the Structure Plan and provisions will promote economic and social wellbeing for people, the local and regional community, and will not adversely affect the life-supporting capacities of air, water, soil or ecosystems. The proposal will provide for improved biodiversity outcomes over the status quo through the proposed Activity Areas LP-E and EC and the ecological management plan requirements.
IM-P11 – Management of natural and physical resources When preparing regional plans and district plans, recognise and provide for the role and use of natural and physical resources in a way or at a rate that supports the social, cultural and economic well-being of Otago's communities now and in the future.	
LF-WAI-O1 – Te Mana o te Wai Otago's water bodies and their health and well-being are protected, and restored or improved where they are degraded, so that the mauri of those water bodies is protected, and the management of land and water recognises and reflects that: (1) water is the foundation and source of all life – nā te wai ko te hauora o kā mea katoa, (2) there is an integral kinship relationship between water and Kāi Tahu whānui, and this relationship endures through time, connecting past, present and future, (3) each water body has a unique whakapapa and characteristics,	The water resources within the Site and the adjacent Mata-Au Clutha River corridor and escarpment will be protected through the removal (over time) of stock – in favour of resort development including large areas of golf and open space – and appropriate stormwater and wastewater management.

Objective	Assessment
(4) fresh water, land, and coastal water have a connectedness that supports and perpetuates life, (5) protecting the health and well-being of water protects the wider environment, (6) Kāi Tahu exercise rakatirataka, manaakitaka and their kaitiakitaka duty of care, and attention over wai and all the life it supports, and (7) all people and communities have a responsibility to exercise stewardship, care, and respect in the management of fresh water.	
LF-WAI-P3 – Integrated management/ki uta ki tai Manage the use of fresh water and land, using an integrated approach that is consistent with tikaka and kawa, that: (1) sustains and, to the greatest extent practicable, restores or improves: (a) the natural connections and interactions between water bodies (large and small, surface and ground, fresh and coastal, permanently flowing, intermittent and ephemeral), (b) the natural connections and interactions between land and water, from the mountains to the sea, (c) the habitats of mahika kai and indigenous species, including taoka species associated with the water bodies, (2) manages the effects of the use and development of land to maintain or enhance the health and wellbeing of freshwater, coastal water and associated ecosystems, (3) ... (4) has regard to foreseeable climate change risks, and the potential effects of climate change on water bodies, including on their natural functioning, (5) has regard to cumulative effects, and (6) applies a precautionary approach where there is limited available information or uncertainty about potential adverse effects, in accordance with IM-P6.	The proposal directly protects areas of remnant indigenous biodiversity including within the northern escarpment area of the Mata-au Clutha corridor. The central lake will be maintained and enhanced as water body and a storage source for irrigation water for the golf course. Stormwater will be appropriately managed, as addressed in the infrastructure assessment (DOCUMENT 10). Wastewater will likely be reticulated through the existing Council system, or otherwise will be reticulated to an onsite treatment and disposal system, which if necessary will be subject to regional consents. Given the location and elevation above the Mata-au Clutha corridor, the Resort development will have no potential effect on any climate change on the Mata-au Clutha or the internal water body. There is no foreseeable cumulative effect on the ongoing use and protection of fresh water. There is no foreseeable risk of adverse effects that would need a precautionary approach, as there is adequate information available about the resources of the Site and the actual and potential adverse effects of the change to resort facilities and activities from the current agricultural use. The consenting process required under the plan change provisions (subdivision and land use consents) will address environmental quality in substantial detail and will apply appropriate management methods to avoid risk.
LF-FW-P16 – Stormwater discharges Minimise the adverse effects of direct and indirect discharges of stormwater to fresh water by: (1) requiring: (a) integrated catchment management plans for management of stormwater in urban areas,	Stormwater management is addressed in detail in the infrastructure assessment (DOCUMENT 10). Stormwater management will be based on Low Impact Design principles, utilising the natural characteristics of the Site to manage runoff in a sustainable and integrated manner. There is an existing internalised drainage regime within the

Objective	Assessment
(b) all stormwater to be discharged into a reticulated system, where one is made available by the operator of the reticulated system, unless alternative treatment and disposal methods will result in the same or improved outcomes for fresh water, (c) implementation of methods to progressively reduce unintentional stormwater inflows to wastewater systems, (d) that any stormwater discharges do not prevent water bodies from meeting any applicable water quality standards set for FMUs and/or rohe, and (e) the use of water sensitive design techniques wherever practicable, and (2) promoting the reticulation of stormwater in urban areas where appropriate, and (3) promoting source control as a method for reducing contaminants in discharges and the use of good practice guidelines for managing stormwater.	Site where all runoff naturally drains toward the central low-lying depression proposed to be Activity Area L. No off-site stormwater discharge will therefore occur. The stormwater management system will be addressed in greater detail during the consenting phases of the resort development, and there is sufficient assessment at the current plan change stage to indicate that management methods will be appropriate for the Site and the wider surrounds.
LF-FW-M6 – District plans Territorial authorities must prepare or amend and maintain their district plans to: (1) ... (2) ... (3) include provisions to preserve the natural character of lakes and rivers and their margins from the adverse effects of land use and development and activities on the surface of water, (4) require, wherever practicable, the adoption of water sensitive design techniques when managing the subdivision, use or development of land, and (5) reduce the adverse effects of stormwater discharges by managing the subdivision, use and development of land to: (a) minimise the peak volume of stormwater needing off-site disposal and the load of contaminants carried by it, (b) minimise adverse effects on fresh water and coastal water as the ultimate receiving environments, and the capacity of the stormwater network, (c) encourage on-site storage of rainfall to detain peak stormwater flows, and (d) promote the use of permeable surfaces.	The proposed provisions include measures to protect and enhance the part of escarpment of the Mata-au Clutha corridor within the plan change area, through Activity Area LP-E. Suitable water sensitive design methods will be adopted through the consenting phase of the development.

Objective	Assessment
EIT-INF-O3 – Protecting <i>infrastructure</i> with national or regional significance <i>Regionally significant infrastructure</i> and <i>nationally significant infrastructure</i> are not compromised by subdivision, use and development.	The Wanaka Airport will not be compromised by the proposed zoning, given the measures in the provisions to: • avoid reverse sensitivity effects by locating sensitive activities outside the Outer Control Boundary; and • reduce bird strike potential by avoiding construction of any permanent water bodies other than within the area of the existing central pond (Activity Area L)
HAZ-NH-O1 – Natural hazards Activities do not exacerbate natural hazard risks within Otago, and are managed to reduce significant natural hazard risk.	The natural hazard risk assessment (DOCUMENT 8) identifies where there is potential risk and the methods to avoid or adequately reduce that risk. Where the risk reduction is required for built development near the top of the Mata-au Clutha corridor escarpment, suitable measures will be adopted at resource consent stage; additional geotechnical investigations will be required at detailed design stage, which will form part of future resource and building consent applications.
NFL-O1 – Outstanding natural features and landscapes The areas and values of Otago's outstanding natural features and landscapes are identified, and the use and development of Otago's <i>natural and physical resources</i> results in the protection of them from inappropriate <i>subdivision</i>, use and development.	The values of the Mata-au Clutha ONF are protected and the ecological values of this part of the ONF within the Site will be enhanced through the <i>Corbridge Resort Ecological Management Plan</i> mechanism in the land use and subdivision rules.
NFL-P2 – Protection of outstanding natural features and landscapes Protect outstanding natural features and landscapes from inappropriate <i>subdivision</i>, use and development by: (1) maintaining the values that contribute to the natural feature or landscape being considered outstanding, even if those values are not themselves outstanding, (2) avoiding, remedying or mitigating other adverse <i>effects</i>; and ...	
NFL-O2 – <i>Highly valued natural features and landscapes</i> The identified values of any <i>highly valued natural features and landscapes</i> are maintained or enhanced.	The landscape values of the part of the Site outside the ONF, and the wider surrounds, are maintained through the location of development areas where they can be absorbed within the landscape without adverse effects when viewed from external locations, and through the mitigation measures including the LAMA mechanism, the vegetation required to be retained, and the bulk, location and external appearance controls.
NFL-P3 – Management of activities within <i>highly valued natural features and landscapes</i> Manage adverse <i>effects</i> of <i>subdivision</i>, use and development within any identified <i>highly valued natural features and landscapes</i> having particular	

Objective	Assessment
regard to the maintenance or enhancement of the values of those areas.	

Accordingly, the change is consistent with, and gives effect to, the relevant RPS provisions.

A District Plan must not be inconsistent with a Regional Plan. There is one relevant regional plan: the **Otago Regional Plan: Water for Otago**. The Regional Water Plan addresses the use, development and protection of the freshwater resources of the Otago region, the beds and margins of water bodies, and the use, development and protection of those water resources. It provides objectives, policies rules and implementation to address the use and management of the water resources.

To the extent that this regional plan is relevant, the Change is not inconsistent with them because the amended provisions of the District Plan will continue to give effect to the regional plans.

7. Evaluation of the provisions under the relevant national planning instruments

National Policy Statements (NPSs) provide objectives and policies for matters of national significance. All subsequent Resource Management documents, including regional policy statements, regional plans and district plans must give effect to (implement) any relevant NPSs.

The following NPSs have no applicability to this requested Change:

- The *New Zealand Coastal Policy Statement*;
- The *National Policy Statement for Renewable Electricity Generation*;
- The *National Policy Statement on Electricity Transmission*;
- The *National Policy Statement for Greenhouse Gas Emissions from Industrial Process Heat*;
- The *National Policy Statement on Urban Development*.

The following NPSs are relevant to the Site and the future management of the Site's natural and physical resources.

NPS for Freshwater Management (NPS-FM)

The objective of the NPS is:

The objective of this National Policy Statement is to ensure that natural and physical resources are managed in a way that prioritises:

- d. first, the health and well-being of water bodies and freshwater ecosystems***
- e. second, the health needs of people (such as drinking water)***
- f. third, the ability of people and communities to provide for their social, economic, and cultural well-being, now and in the future.***

The policies implement this objective and generally relate to freshwater management, natural inland wetland, the loss of river extents and protection of waterbodies and freshwater species. As discussed above, the Site contains two man-made water bodies and no wetlands or Natural Inland Wetlands. To the extent relevant, the Request is consistent with the NPS-FW.

NPS for Indigenous Biodiversity (NPS-IB)

The objective of the NPS-IB is:

The objective of this National Policy Statement is:

- a. to maintain indigenous biodiversity across Aoteroa New Zealand so that there is at least no overall loss in indigenous biodiversity after the commencement date; and***
- b. to achieve this:***
 - i. through recognising the mana of tangata whenua as kaitiaki of indigenous biodiversity; and***
 - ii. by recognising people and communities, including landowners, as stewards of indigenous biodiversity; and***
 - iii. by protecting and restoring indigenous biodiversity as necessary to achieve the overall maintenance of indigenous biodiversity; and***
 - iv. while providing for the social, economic, and cultural wellbeing of people and communities now and in the future.***

The policies implement this objective and generally require integrated management and a precautionary approach when considering adverse effects on indigenous biodiversity. The Change is located within a land environment on which less than 10% of the original indigenous cover remains and does not contain any SNAs. The Change seeks to protect and enhance areas of ecological value on the Site and therefore is consistent with the direction of the NPS-IB.

NPS for Highly Productive Land (NPS-HPL)

The objective of the NPS-HPL is:

Highly productive land is protected for use in land-based primary production, both now and for future generations.

The policies implement this objective and direct that highly productive land is mapped and includes in regional policy statement and district plans, and managed in an integrated way that considers the interactions with freshwater management and urban development. Policy 5 seeks to avoid urban rezoning of highly productive land and Policy 7 requires the avoidance of subdivision of highly productive land, except as provided for in the National Policy Statement.

Approximately 80% of the Site (260 ha) is classified as Land Use Capability (**LUC**) 3 (and therefore meets the definition of Highly Productive Land) and the remaining 20% (63 ha) is unclassified / other.

As discussed above, Clause 3.6 seeks to restrict urban rezoning of highly productive land, unless the rezoning meets the exceptions listed in 3.6(1) – (5). Clause 3.6(6) states that the restrictions on urban zoning do not apply to LUC 3 land. This provides an avenue for urban rezoning of LUC 3 land. Under the National Planning Standards, urban' as a description of a zone includes any special purpose zone, open space zone and sport and recreation. The Request is for a special purpose zone (under the National Planning Standards) and therefore the part of the Site that meets the definition of Highly Productive Land can be rezoned as a Resort, as a Special Zone in Part Six of the PDP.

The Change is therefore consistent with the NPS-HPL.

NPS for Natural Hazards (NPS-NH)

The objective of the NPS-NH is:

Natural hazard risk to people and property associated with subdivision, use and development is managed using a risk-based proportionate approach.

The policies seek to manage subdivision, use and development using a risk-based proportionate approach, and avoidance where there is very high natural hazard risk. An assessment against the risk matrix in the NPS-NH is contained within the Geotechnical Report in [DOCUMENT 8](#).

The Structure Plan enables development in areas that are considered to be low risk and therefore the Change is consistent with the NPS-NH.

Summary

In summary, the Change proposed is consistent with the relevant NPSs.

8. Iwi Management Plans

The relevant provisions of the MNRMP 2008 and the KTKO NRMP 2005 are assessed in [Tables 12](#) and [13](#) below.

Table 12: Provisions of the Te Tangi a Tauria: The Cry of the People relevant to the proposal.

Provision	Detail	Assessment
3.2.2	Amenity Values	
Visual amenity and intrusion		
1.	Limit through promotion of improved production and techniques, visual and physical effects from activities associated with exhaust emissions, dust, unacceptable and intense odour, smoke and lighting.	The Request protects and maintains landscape and visual amenity values.
2.	Ensure where avoidable that impacts from activities that create effects such as glare, shading, or electrical disturbance do not interfere with the amenity values associated with a place, environment or neighbouring property.	
Effects of Development/Industry on Amenity Values		
3.	Ngāi Tahu ki Murihiku shall actively participate in interagency and cross boundary decision making in respect to development, design and placement of structures and where appropriate may provide qualified recommendations for the protection of amenity values.	Consultation has been undertaken with Te Ao Marama and Aukaha since the inception of the project and the Requestor continued to engage with their representatives as the masterplan, provisions and expert assessment were prepared. Consultation and engagement remain ongoing.
4.	Ngāi Tahu ki Murihiku shall provide qualified recommendations with respect to concerns raised related to odour and offensive discharge, from rural, urban and industrial activities.	
6.	Where there may be visual impacts on the natural and cultural landscapes as a result of	The Structure Plan has been masterplanned so that

	development, encourage the integration of landscaping techniques which utilise reserve planting or vegetation screens to soften intrusion.	development is visually indiscernible within the topography. Landscaping and vegetation will be implemented within LAMAs where necessary.
3.5.10	General Water Policies	
1.	The role of Ngāi Tahu ki Murihiku as kaitiaki of freshwater must be given effect to in freshwater policy, planning and management.	The infrastructure assessment outlines the best practice methods to be adopted in the establishment and ongoing operational management of the three waters infrastructure for the Zone. Sound environmental practices will be adopted at all stages of subdivision and development, in accordance with the Earthworks and Subdivision provisions of the PDP, and the relevant codes of practice for construction works. The Zone will connect to Council's reticulated system. The development will be able to manage all stormwater runoff on site; no discharge to the adjacent Mata-au Clutha River is necessary.
2.	Work with local authorities and other statutory agencies involved in freshwater management to ensure that cultural values and perspectives associated with freshwater management are reflected in statutory water plans, best practice guidelines and strategies, and in resource consent processes for activities involving water.	
3.	Protect and enhance the mauri, or life supporting capacity, of freshwater resources throughout Murihiku.	
4.	Manage our freshwater resources wisely, mō tātou, ā, mō ngā uri ā muri ake nei, for all of us and the generations that follow.	
5.	Promote the management of freshwater according to the principle of ki uta ki tai, and thus the flow of water from source to sea.	
6.	Promote catchment management planning (ki uta ki tai), as a means to recognise and provide for the relationship between land and water.	
8.	Protect and enhance the customary relationship of Ngāi Tahu ki Murihiku with freshwater resources.	
9.	The role of Ngāi Tahu ki Murihiku as kaitiaki of freshwater must be given effect to in freshwater policy, planning and management.	
3.5.17	Ngā Pononga a Tāne a Tangaroa - Biodiversity	
1.	Use planning, policy and resource consent processes to promote the protection and, where necessary, enhancement, of native biodiversity of Murihiku, specifically: a. enhancement and restoration of degraded areas; b. planting of native species to offset or mitigate adverse effects associated with land use activities; c. the incorporation of biodiversity objectives into development proposals; d. prohibiting the use of pest plant species in landscaping	The Zone protects areas of existing ecological value and will provide for improved biodiversity outcomes through the proposed Activity Area LP-E and EC and the ecological management requirements.
4.	Where practical, indigenous vegetation that is removed or damaged as a result of land use activity should be replaced.	

6.	Recommend the planting of indigenous species as an appropriate mitigation measure for any adverse impacts as a result of land use activity.	
7.	The cultural, spiritual, historic and traditional association of Ngāi Tahu ki Murihiku with taonga species must be recognised and provided for within all management and/ or recovery plans associated with those species. This includes taonga species as per the Ngāi Tahu Claims Settlement Act (Appendix 4), and all other species identified as taonga by Ngāi Tahu ki Murihiku.	

In summary, the Request includes Rūnaka engagement, both prior to lodgement and during the Schedule 1 process. The Request provides for appropriate servicing of development by reticulated infrastructure and improvements to ecological and biodiversity values.

Overall, the Request is consistent with the MNRMP 2008.

Table 13: Provisions of the Kai Tahu Ki Otago Natural Resource Management Plan relevant to the proposal.

proposal.

Provision	Detail	Assessment
5.5	Mahika Kai And Biodiversity Te Rereka Kētaka O Kā Kaiao Me Te Mahika Kai	
5.5.3	Mahika Kai and Biodiversity Objectives	
i.	Habitats and the wider needs of mahika kai, taoka species and other species of importance to Kāi Tahu ki Otago are protected.	The Zone protects areas of existing ecological value and will provide for improved biodiversity outcomes through the proposed Activity Area LP-E and EC and the ecological management requirements.
v.	Indigenous plant and animal communities and the ecological processes that ensure their survival are recognised and protected to restore and improve indigenous biodiversity within the Otago Region.	
vi.	To restore and enhance biodiversity with particular attention to fruiting trees so as to facilitate and encourage sustainable native bird populations.	
vii.	To develop strategies and implementation plans for comprehensive control and/or eradication of pest species in targeted areas beyond conservation managed lands.	
ix.	To create a network of linked ecosystems for the retention of and sustainable utilisation by native flora and fauna.	
5.6	Cultural Landscapes	
5.6.3	Cultural Landscapes Objectives	
i.	The relationship that Kāi Tahu ki Otago have with land is recognised in all resource management activities and decisions.	Consultation has been undertaken with Te Ao Marama and Aukaha since the inception of the project and the Requestor continued to engage with their representatives as the masterplan, provisions and expert assessment were prepared.
ii.	The protection of significant cultural landscapes from inappropriate use and development.	

iii.	The cultural landscape that reflects the long association of Kāi Tahu ki Otago resource use with in the Otago region is maintained and enhanced.	Consultation and engagement remain ongoing.
5.6.4	Cultural Landscapes General Policies	
3.	To promote the control of visitor and recreational activities that impact on significant landscapes.	The Zone provides for recreational activities however these do no impact on significant landscapes.
10	Clutha/Mata-Au Catchments Te Riu O Mata-Au	
10.2.3	Wai Māori Policies in the Clutha/Mata-au Catchment Sediment and Siltation	
5.	To discourage activities that increases the silt loading in waterways or reaches of waterways.	The Earthworks Chapter manages any potential silt and sedimentation effects associated with earthworks in all Zones.
	Land use	
9.	To encourage the adoption of sound environmental practices, adopted where land use intensification occurs.	Sound environmental practices will be adopted at the stage of subdivision and development, in accordance with the Earthworks and Subdivision provisions of the PDP, and the relevant codes of practice for construction works.
10.	To promote sustainable land use in the Clutha/Mata-au Catchment.	The Zone enables sustainable use of land as promoted by the Structure Plan and provisions that promote economic and social wellbeing for people, the local and regional community, and will not adversely affect the life-supporting capacities of air, water, soil or ecosystems.
12.	To require reticulated community sewerage schemes that have the capacity to accommodate future population growth.	The Zone will connect to Council's reticulated system.
11	Implementation And Review Te Mahi O Te Mahi Me Te Tirohaka Hou	
11.5	Effective Participation Through Consultation Mā Te Kōrero Tahi Kā Whai Wāhitaka	
11.5.2	Policy	
1.	To require all consultation with Kāi Tahu Ki Otago to: • occur at the earliest possible stage. • recognise that the nature and extent of Kāi Tahu ki Otago involvement will be determined by Kāi Tahu ki Otago. • support the development of effective relationships.	Consultation has been undertaken with Te Ao Marama and Aukaha since the inception of the project and the Requestor continued to engage with their representatives as the masterplan, provisions and expert assessment were prepared. Consultation and engagement remain ongoing.

	• allow sufficient time to make informed decisions. • extend beyond asking for opinions, to seeing recommendations and reflecting these in final decisions. • occur kanohi ki te Kanohi. • be adequately supported and resourced.	
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In summary, the Request provides for sustainable land use via efficient development, serviced by the existing reticulated networks with no direct discharge to water as a result.

Overall, the Request is consistent with the KTKO NRMP 2005.

9. Consultation

The Requestor has had ongoing dialogue with Aukaha and Te Ao Marama since the earliest phases of the masterplan design and has kept these parties regularly updated with the investigations including most importantly the draft plan set, proposed provisions and ecological assessment. As a result of the discussions, no changes have yet been made to the proposal.

Further details of the consultation undertaken and the response to the engagement are set out in [DOCUMENT 1](#).

10. Summary and conclusions

The above evaluation has examined the Request under Section 32 of the Act. The broad conclusions from that evaluation are that:

- (a) Under section 32(1)(a), the objectives of the Change are the most appropriate way to achieve the purpose of the Act, taking into account the relevant issues arising from settled higher order provisions of the PDP and the relevant provisions of the regional and national planning instruments;
- (b) Under Section 32(1)(b), the Change is the most appropriate way to achieve the objective of a Resort within the Site;
- (c) Under Section 32(1)(b)(ii), the proposed provisions will be efficient and effective in achieving the objectives, taking into account their costs and benefits including the environmental, social and economic costs and benefits, and taking into account the expert reports;
- (d) There is no risk to acting, however the risks of not acting are significant to SIO and the wider community because of the loss of opportunity for the significant socio-economic benefits arising from the proposed zoning.

Overall, for the reasons expressed above, and in the supporting reports including the assessment of effects on the environment, the Change will achieve the higher order objectives of the PDP and the purpose and principles of the Act.