

**BEFORE THE HEARINGS PANEL  
FOR THE QUEENSTOWN LAKES PROPOSED DISTRICT PLAN**

In the matter                   **OF THE RESOURCE MANAGEMENT ACT 1991**

and

In the matter                   **OF A PRIVATE PLAN CHANGE TO THE QUEENSTOWN  
LAKES PROPOSED DISTRICT PLAN: PROPOSED  
PRIVATE PLAN CHANGE 1 THE HILLS RESORT ZONE**

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**JOINT WITNESS STATEMENT**

**PLANNING**

Dated: 7 April 2026

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## 1. INTRODUCTION

- 1.1 This joint witness statement relates to expert conferencing on the topic of planning.
- 1.2 This joint witness statement relates to a request for a private plan change to Chapter 47 – The Hills Resort Zone (**THRZ**) of the Queenstown Lakes District Council's (**QLDC/Council**) Proposed District Plan (**PDP**). The request was made by the landowner, The Hills Resort Limited (**THRL**), to change the zone's current Structure Plan by amending the location and extent of existing activity areas, establishing 11 additional home sites in the south of THRZ and providing for three new activity areas associated with the resort, along with consequential amendments to provisions arising from these changes (**Plan Change**).
- 1.3 The expert conferencing was held at a meeting in Queenstown on 2 April 2026. The session was not facilitated, and only the two planning experts attended.
- 1.4 The expert attendees at the conference were:
  - (a) **Jeffrey Andrew Brown** for the Proponent, THRL. Mr Brown is the author of a Statement of Evidence dated 13 March 2026.
  - (b) **Craig Alan Barr** for QLDC. Mr Barr is the author of a s42A Report/Statement of Evidence dated 13 February 2026, and addendum dated 18 March 2026.

## 2. CODE OF CONDUCT

- 2.1 This joint witness statement is prepared in accordance with sections 9.4 to 9.6 of the Environment Court Practice Note 2023.
- 2.2 We confirm that we have read the Environment Court Practice Note 2023 and agree to abide by it. The experts confirm that the issues addressed in this joint witness statement are within our area of expertise, unless stated otherwise.

## 3. PURPOSE AND SCOPE OF CONFERENCING

- 3.1 The purpose of conferencing was to identify, discuss and highlight points of agreement and disagreement between the two planning experts.

- 3.2 Conferencing proceeded in line with the agenda agreed to by all relevant parties and experts.
- 3.3 The attendees reviewed each other's evidence prior to conferencing.
- 3.4 **Annexure A** records the agreed issues, areas of disagreement and the reasons, along with any reservations.

**Date:** 7 April 2026



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**Jeffrey Andrew Brown**



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**Craig Alan Barr**

**ANNEXURE A – EXPERT CONFERENCING ON PLANNING**

**Participants: Jeffrey Andrew Brown [JAB]; Craig Alan Barr [CAB]**

Issue	Agreed Position	Disagreements or reservations, with reasons
<b>Key issues:</b>		
<p><b>Hogans Gully Road Access</b></p> <ul style="list-style-type: none"> <li>- Provisions for the new access limiting use to selected homesites. Confirm agreement on policy and JAB's amendments.               <ul style="list-style-type: none"> <li>o Rule 27.7.22 new matter of control.</li> <li>o Amendment to policy 47.2.1.4.</li> </ul> </li> </ul>	<p>The planners agreed on the provisions (tabled in JAB's evidence).</p>	
<p><b>Trail along Hogans Gully Road</b></p> <ul style="list-style-type: none"> <li>- Whether the trail adjacent to the Hogans Access should continue throughout the site and through the BHT land. (Note: <i>deferred by</i></li> </ul>		<p>Not resolved/agreed.</p> <p>However, JAB and CAB understand that discussions are being held between the Requestor and the Submitter (Queenstown Trails Trust) about the various options for trail access through to Arrowtown – Lake Hayes Road.</p>

<p><i>Landscape JWS to planners at 3.10)</i></p>		<p>JAB maintains that it is out of scope.</p>
<p><b>Trail Adjacent to Submitter Dan's property</b></p> <ul style="list-style-type: none"> <li>- Mr Dan's statement of evidence seeks input at time of development, but not likely in a formal sense because the plan provisions provide for development in accordance with the Structure Plan and provisions to be non-notified (controlled and RDA).</li> <li>- Discuss new matter of control rule 47.4.1(f).</li> </ul>	<p>JAB and CAB note this issue and agree that no further provisions are required in addition to those tabled in JAB's evidence (the new matter of control in Rule 47.4.1(f) which relates specifically to the Dan property).</p>	
<p><b>SPA and LAMA areas</b></p> <ul style="list-style-type: none"> <li>- Confirm agreement that new SPA or LAMA areas shown on SP don't require any further / dedicated plan provisions.</li> </ul>	<p>JAB and CAB agree that the current provisions sufficiently allow for these additional areas to be managed.</p>	

## Repositioning of Home Sites

<ul style="list-style-type: none"> <li>- Whether the new RDA rule for southern homesites needs to be able to be subject to s95 assessment (currently RDA activities are non-notified)             <ul style="list-style-type: none"> <li>o (Note: <i>deferred by landscape JWS to planners at 3.11</i>)</li> </ul> </li> <li>- Although the tiering RDA height (47.5.4) applies to AAs 4 and 5 these are centrally located within the site and are less visually sensitive, whereas the new homesites are in an area that is spilling over into a different landscape setting (See Bridget Gilbert's evidence) but on that basis are the planning provisions appropriate that the RDA building height (i.e new rule 47.5.3A) is non-notified?</li> </ul>	<p>JAB and CAB agree that because of the additional evaluation undertaken for Homesites 10, 12, 15 and 16 there has been a sufficient level of rigor into the appropriateness of these Homesites. No amendments are required to enable consents required by Rule 47.5.3A to be subject to public notification or limited notification assessments.</p> <p>The matters of discretion in JAB's recommended rule 47.5.3A are coupled with the Objective 47.2.1 and Policies 47.2.1.2(c):</p> <p><i>c. Visibility of buildings from beyond the Zone, particularly from adjacent public roads and the Arrowtown escarpment, is mitigated through appropriate siting and landscaping (including LAMA);</i></p> <p>and 47.2.1.15:</p> <p><i>Avoid or mitigate adverse visual effects of development and associated infrastructure within and beyond the Zone through controls on</i></p>	
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<ul style="list-style-type: none"> <li>- Does the matter of D need to include consideration of cumulative effects of Homesites 9, 10, 11, 12, 15 and 16?</li> <li>- Should the cumulative issue be identified as a matter of discretion, and that the cumulative effect relates to 10, 12, 15 and 16, whether any were also established and exceeded rule 47.5.3A? Is this relevant/taken care of if s95 able to be applied?</li> <li>- Any other changes to provisions relating to HS9, HS10, HS11, HS12, HS15 and HS16.</li> </ul>	<p style="text-align: center;"><i>building height, light spill, external appearance, coverage and landscaping requirements.</i></p> <p>The additional evaluation from the amendments provide more rigor, and the matters of discretion alone are adequate in terms of sufficient ability for the Council to ensure an appropriate outcome.</p> <p>JAB and CAB discussed this, if the matter of cumulative effects were identified, it would need to be specific as to what other elements in the environment were contributing to the cumulative effect, and this would be limited to the collective effects of Home Sites 10, 12, 15 and 16 and only if development on any of these Homesites had already obtained a consent under Rule 47.5.3A.</p> <p>In this context, given the location of the Home Sites, the design controls and the associated SPA and LAMA, the building height exceedance of up to 1m is not enough to require a cumulative effects assessment. Noting that the associated non-complying rule 47.5.3B, where the building heights are exceeded further than the tolerances provided for in rule 47.5.3A, would allow consideration of cumulative effects and require an assessment to</p>	
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	<p>determine if the application should be processed on a publicly notified or limited notified basis.</p> <p>No changes to other rules or new provisions are identified as necessary.</p>	
<p><b>Helicopter</b></p> <ul style="list-style-type: none"> <li>- Discuss and agree new AA H. (Note: Marshall Day report attached to JAB's evidence).</li> </ul>	<p>Agreed.</p> <p>CAB notes and has read Marshall Day report attached to JAB's evidence.</p>	
<p><b>AA SG</b></p> <ul style="list-style-type: none"> <li>- Discuss JAB's recommended amendments to provisions relating to Todd submission.</li> </ul>	<p>CAB notes amendments, agree that these will reduce the scale and potential for disruption to off-site residential amenities. Agrees with JAB's provisions tabled in his evidence.</p>	
<p><b>Other:</b></p>		
<p><b>Resort and new CAB's new staging provisions</b></p>		<p>Not agreed.</p> <p>JAB maintains his view as set out in his EIC at paragraphs 3.62 – 3.68.</p> <p>Note: JAB will provide an update on consenting progress for VA units.</p>

<p><b>Other Provisions</b></p> <p>Rules 47.4.5 and 47.4.7 and 47.4.22</p>	<p>JAB agrees to retain Rules 47.4.5, 47.7.7 and 47.4.22 as noted in evidence.</p> <p>JAB to provide marked-up version of provisions at hearing.</p>	
<p>Rule 27.7.22 and reference to 6 month timing.</p>	<p>CAB agrees with explanation in paragraphs 3.71 and 3.72 of JAB evidence, and that the provisions can be amended as requested.</p>	
<p>Rule 47.4.10 and the removal of AA S1 and S2 being maintained in the same ownership as Activity Areas C and G and is not subdivided, unit titled or otherwise separated (including by lease).</p>	<p>JAB and CAB discussed the matter of the rule being removed as requested.</p> <p>CAB's concern relates to the potential for S1 and S2 to be leveraged for residential use in way that is not anticipated by the plan provisions. Particularly important matter as it relates to residential activity.</p> <p>However, given that the provisions make it clear as to the intended function and limited extent of the quantum of residential activity CAB is satisfied that the requirement for these areas to be held in the same record of title as AA C and AA G is not necessary, and that the benefits of this do not outweigh the potential costs or issues with frustrating the Requestor's land business model intentions.</p>	

	<p>The policy intentions of The Hills Resort Zone overall, would make it very difficult to obtain a resource consent to use AA S1 and S2 for a residential use other than for worker accommodation.</p> <p>CAB agrees to the amendment to the rule.</p> <p>Note that JAB did not address this issue in EIC but agrees with CAB as above.</p>	
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