QUEENSTOWN LAKES DISTRICT COUNCIL

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The South Island Office
C/ - Brown and Company Planning Group
PO Box 1467
QUEENSTOWN

PRIVATE PLAN CHANGE REQUEST TO THE PROPOSED DISTRICT PLAN

PPC5: Northlake Special Zone

REQUEST FOR FURTHER INFORMATION

Tēnā kōrua Morgan and Jeff,

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

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

> *(1) Where a local authority receives a request from any person under clause 21, it may within 20 working days, by written notice, require that person to provide further information necessary to enable the local authority to better understand—*
>
> > *(a) the nature of the request in respect of the effect it will have on the environment, including taking into account the provisions of Schedule 4; or*
> >
> > *(b) the ways in which any adverse effects may be mitigated; or*
> >
> > *(c) the benefits and costs, the efficiency and effectiveness, and any possible alternatives to the request; or*
> >
> > *(d) the nature of any consultation undertaken or required to be undertaken—*
>
> *if such information is appropriate to the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change or plan.*

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

Executive Summary

This request seeks information that will assist Council to better understand the effects of the proposal on the Plan Change site and its surrounding environment, any mitigative measures to address adverse effects, the efficiency and effectiveness, and the related benefits and costs of the proposal when compared with alternative outcomes, and the consultation that has been undertaken for the proposal.

Council requests further information on the following documents that were included in the Plan Change application:

- **Request for a Change to the Proposed Queenstown Lakes District Plan** (version dated 9 October 2026)
- **Section 32 Evaluation** (version dated 9 October 2026)
- **Proposed District Plan Provisions** (version dated 9 October 2026)
- **Assessment of Effects on the Environment** (version dated 9 October 2026)
- **Landscape Assessment Report, by RMM Landscape Architects** (version dated 8 October 2026)
- **Graphic Attachment to Landscape Assessment Report, by RMM Landscape Architects** (version dated 24 September 2026)
- **Transportation Assessment, by Carriageway Consulting**, (version dated 8 October 2026)
- **Geotechnical Assessment, by RDA Consulting** (version dated 23 April 2026)
- **Soil Contamination Assessment by Insight Engineering** (version dated 30 January 2026)
- **Urban Design Statement, by George Watts** (version dated 14 September 2026)
- **Ecological Assessment by Wildlands** (version dated 9 October 2026)
- **Infrastructure Assessment Report, by Patersons Land Professionals** (version dated 17 June 2026)

Both Council staff and external experts have assessed the proposal. The information requested relates to the following fields of expertise:

- Planning
- Transport Planning
- Landscape Architecture
- Three Waters Infrastructure
- Parks and Reserves
- Natural Hazards
- Ecology

Planning Information Requested

An external planner (Avanzar Consulting Ltd) has assessed the Request for a Change to Proposed Queenstown Lakes District Plan, Section 32 Evaluation, Assessment of Environmental Effects, and Proposed District Plan Provisions to determine further information requirements related to planning matters. Council is requesting further information on the following matters:

1. Development capacity

The differences between new zoning sought through the Request and the NSZ Activity areas may lead to more development than the requestor anticipates. Understanding the potential for the proposed zones to enable infilling on existing 'developed' lots assists in understanding the nature of potential effects for traffic, infrastructure and community facilities better.

The PDP suburban residential zone, which replaces AA C1 and AA B2 – B4, permits a maximum of 1 residential unit per 450 m² net area, enabling approximately 22 dwellings per hectare.

These zone changes present significant increases in density compared to AA C1 which permits 4.5 residential units per hectare and AA B2-B4 which permit 10 residential units per hectare, under ODP Standard 12.34.4.2 (iii).

Traffic and servicing conclusions assume about 1,595 dwellings against a 1,600 design basis. Extra infill may have effects on transport, servicing and landscape character and these must be assessed against what the zones enable, not what a private covenant currently limits.

Council requests the following information, pursuant to cl 23(1)(a) and (c) of the First Schedule:

- Please provide further analysis showing plan-enabled and realistic yield by proposed zone and Activity Area, for the whole Site and for the REA separately, under the ODP NSZ provisions and the proposed PDP zones, with the assumptions around the spread of infill across the plan change area.
- Please confirm whether the yield previously provided (about 1,600 / 1,595) assumes no infill on the already-developed portion of the Site, and whether that assumption is achieved through the Northlake Design Controls (e.g. one unit per site) rather than the proposed zone provisions.
- If so, please set out the infill uptake and distribution assumed, and provide a maximum-yield scenario based solely on the proposed PDP provisions (including permitted multi-unit development and minimum lot sizes), identifying the net area lost to shrubland planting, bunding and trails. Assumptions should include the ongoing ability to secure covenant controls into the future.
- Please provide further analysis on the costs/benefits, efficiency/effectiveness of the covenant mechanism to control density throughout the life of the District Plan. While the Northlake Design Controls are secured by restrictive covenant and typically allow one dwelling per lot, Council questions the ability of this mechanism to maintain built form when NIL may waive, vary or amend these without notice, and its responsibility ends 15 years after the first title or on handover.

2. PDP and ODP provisions

Replacing the Special Zone with a mixture of PDP zones may have unintended consequences in terms of linkages with provisions elsewhere in the Plan.

Document 2 amends only PDP Chapters 11 and 27 and the planning maps. It makes no changes to ODP Chapter 12 (including its Structure Plan) and does not say how Chapter 12 will cease to apply over the Site.

Council requests the following information, pursuant to cl 23(1)(a) of the First Schedule:

- Please provide a table identifying all the NSZ provisions (comprising Chapter 12.33 and 12.34, and provisions elsewhere in the Plan) that cease to apply, are to be replaced, or remain, for the Site and the retained NSZ land, with the exact text and maps that would change.
- As a minimum, please address:
    - Special Zone Chapter: Rule 12.34.4.2.i (Structure Plan compliance); the Outline Development Plan and Staging Plan rules (12.34.2.3, 12.34.4.2.ii) and assessment matters j and k; the non-notification rule for adjoining owners (12.34.3); and how the retained Activity Areas (Pembroke Heights B1, Hikuwai B5/C4/E3/E4, Urquhart C3/E2, TPAs) will integrate with adjoining land once the neighbouring Activity Areas no longer exist (Policies 2.2–2.4, 3.1–3.6, 6.1–6.2).
    - ODP Chapter 15: Policies 5.9–5.10; Rules 15.2.3.3(x) and (xi); 15.2.3.4(xx) (legal vehicle and infrastructure access to Sticky Forest from B6); 15.2.3.6(d); lot size Rule 15.2.6.3 (A and C4 4000m²; C1 1200m²) and (xi) (E1 in one allotment); 15.2.6.4(k); 15.2.8.2A and 15.2.8.3(xiv) (Aubrey Road and Outlet Road access); 15.2.12.3(xvi) (B6 stormwater); and 15.2.20.1 (20 affordable lots in D1).
    - Other ODP provisions: Rule 14.2.4.1(vi) (back lanes); the Section 16 table; Section 18 Activity Tables 1 and 2; Appendix 3 (TPA1–TPA4 and the titles they are tied to); and earthworks, where Rules 15.2.21.1 and 22.3.2.1(d) exempt Section 12 Special Zones, so please confirm what earthworks controls would apply to the Site and to the retained NSZ land.
    - The proposed provisions: how the Sticky Forest vehicle and servicing link (NSZ Policy 3.1; PC54; Condition 47 of the Northbrook consent) is secured when it does not appear on Structure Plan 27.13.X or in Rules 27.7.33B; what setback, coverage, height and colour standards apply to existing C1 and A lots outside the structure plan boundary under Rules 11.5.2.3 and 11.5.4; and what replaces the NSZ controls listed in the summary.

3. Affordable housing

Provision 1.1B.d of the PDP adopts ODP objectives and policies on Affordable and Community Housing (ODP Section 4.10). Under ODP 4.10, resource consents and proposed plan changes are required to apply Objective 4.10.1 and Policies 1.1– 1.3 in their assessment of proposals.

Objective 4.10.1 requires access to Community Housing or the provision of a range of residential activity that contributes to housing affordability in the district. This includes providing opportunities for low and moderate-income households to live in the district in a range of accommodation appropriate for their needs, that regard be had to the extent to which density, height or building coverage contributes to Residential Activity affordability and that the delivery of Community Housing is enabled through voluntary Retention Mechanisms.

Northlake Investments Ltd have fulfilled their requirement under ODP provisions (15.2.20.1) to deliver 20 affordable lots in Activity Area D. The above provisions that related to affordable and community housing however, remain live. Given fast track applications have organised Heads of Agreements with Queenstown Lakes Housing Trust, where they have voluntarily contributed 5% of total proposed lots to the Trust, Council seeks to continue this precedent for future changes.

Council requests the following information, pursuant to cl23(1)(c) of the First Schedule:

- Please explain how the proposed plan change is the most appropriate way to achieve the objectives relating to affordable housing.
- Please provide an assessment of the benefits and costs, efficiency and effectiveness and any possible alternatives for providing affordable housing.

4. Consultation with Iwi

Aukaha and Te Ao Mārama were notified, with no response at lodgement. An online meeting on 21 March 2026 with Aukaha, Te Ao Mārama, Te Rūnanga o Ngāi Tahu and Te Tari Whakatau, held under the SILNA successors heading, produced no feedback. There is no cultural assessment. The s32 finds the request consistent with the Kāi Tahu ki Otago (2005) and Ngāi Tahu ki Murihiku (2008) plans, with detail in Appendix B. The Wāhi Tūpuna overlay is about 300 m to the north.

Council requests the following information, pursuant to cl23(1)(a) and (d) of the First Schedule:

- Please provide records of engagement and any responses from Aukaha, Te Ao Mārama and the SILNA successors,
- Indicate whether mana whenua have asked for a cultural impact assessment or other input, and the response proposed,
- If mana whenua have indicated that a cultural impact assessment is needed, please provide an assessment of effects on cultural values, or the impact on adjoining land within Sticky Forest relevant as part of a historical redress under the 1998 settlement, drawing on that engagement.

5. Options analysis

The Section 32 has given limited analysis of the costs, benefits, efficiency, effectiveness and possible alternatives to the proposed MDR, LSCZ and LLR-A zones, except to say that they are the most appropriate standard PDP zones available.

Council requests the following information, pursuant to cl 23(1)(c) of the First Schedule:

- Please provide further explanation about why each zone is placed where it is.
- Consider whether development would be more appropriately delivered in other areas of Northlake.

6. Analysis under Policy 1 NPS-UD

Council is required to assess whether the proposed zoning contributes to a well-functioning urban environment.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Explain how the Residential Extension Area will contribute to a well-functioning urban environment. In particular, explain why it does not create a sprawling extension and/or more of a “dead end” area.

Transport Information Requested

An external transport planner (Abley ltd) has reviewed the Transport Assessment Report, the Graphic Attachment to Landscape Assessment Report, Assessment of Environmental Effects (Document 3), and Proposed District Plan Provisions (Document 2) to determine further information requirements related to transport. Council is requesting the following further information for each document:

1. Transport Assessment Report

Table 11 and paragraphs 7.1.6-7.1.7 of the ITA assesses the delays and queuing at the Aubrey Road / Outlet Road intersection and concludes these are *"substantial*" in the morning peak. The discussion suggests a form of intervention such as a roundabout is required when LoS E is reached.

Council requests the following information, pursuant to cl23(1)(a)-(c) of the First Schedule:

- Please undertake a sensitivity test to establish when LoS D/E threshold is reached and consider the costs, benefits, efficiency and effectiveness of including a staging provision within the Plan. The sensitivity test should also include an appropriate allowance for likely future background traffic growth on Aubrey Road.
- Please comment on the potential impact of second dwellings on lots, specifically on the assessment and findings included in sections 6 and 7 of the ITA. This should be considered with respect to the baseline assessed as well as the effects of additional traffic generation associated with the PPC.
- The Aubrey Road and Anderson Road roundabout is understood to experience delays and queueing at peak times. Please comment on the effects of the traffic generated by the proposal on that roundabout.
- Access into the development from Carrickmore Crescent is on the outside of a curve with potentially limited visibility to the left for vehicles exiting the REA. Please provide a visibility assessment to confirm an appropriate intersection at this location can be supported.

2. Graphic Attachment to Landscape Assessment Report

Page 10 of the landscape graphic attachment does not include footpaths on several roading links. Although Council notes that internal roading design detail is normally a matter considered at the time of subdivision consent, it queries this in response to the contents of the landscape graphic attachment provided as part of the application.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Please confirm the intended design standard of all roading links including pedestrian provision (number of sides with footpaths and corresponding widths), including with reference to the standards in QLDC 2025 Land Development and Subdivision Code of Practice table 3-3.
- Noting the topography of the site, please confirm that the grades of primary roading links and associated pedestrian infrastructure can meet the QLDC 2025 Land Development and Subdivision Code of Practice table 3-3 design standards.

3. Assessment of Environmental Effects

The AEE section 4 concludes that no additional transport-related plan provisions are necessary, with intersection capacity to be addressed at resource consent stage.

Council requests the following information, pursuant to cl23(1)(b) of the First Schedule:

- Noting that the PDP Table 29.5 includes thresholds for new high traffic generation activities (including a 50 residential unit threshold), please advise what mechanism is in place to ensure intersection capacity will be satisfactorily assessed for any subsequent application of less than 50 residential units.

4. Proposed District Plan Provisions

The Northlake Structure Plan appended to the Proposed Changes to the District Plan (Document 2) includes the location of walkway/cycle links but does not include the primary roading links shown on page 10 of the landscape graphic attachment.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Please update the Structure Plan to include intended roading connections to the wider Northlake Structure Plan to ensure adequate primary transport links are provided.

Landscape Information Requested

An external landscape architect (Bridget Gilbert Landscape Architecture) has reviewed the Landscape Assessment Report, by RMM Landscape Architects (the RMM Report), and appendices to assess whether further information is required. Council is requesting the following further information:

1. Purpose of the Building Restriction Area

The RMM Report appears to rely on a technically incorrect description of the landscape planning context in relation to AA E1, which may have bearing on the landscape effects analysis and conclusions. The RMM Report states (at Pages 11 and 12) that the purpose of *AA - E1, as a Building Restriction Area (BRA) to protect the treed backdrop and natural edge of Northlake and provide a transition between urban Northlake and Sticky Forest, is now redundant due to the changing environment and rezoning of Sticky Forest.*

This is incorrect, as while the rezoning of Sticky Forest has altered the context of E1 to the west of the site, at the northern / north-eastern edge of the site, including where the BRA applies (see image below), there has been no change to the treed backdrop and natural edge of the Northlake E1 context.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Please explain how and why the stated purpose of the BRA "*to protect the treed backdrop and natural edge of Northlake"* is now redundant at the northern / northeastern edge of the site, in terms of its effects on the environment.



Figure 1: The north / northwestern edge of the site with treed backdrop

2. Assessment against ODP policy context

The policy context for E1 is an important 'starting point' for the plan change. Existing district plan provisions articulate the broader community vision for an area, which speaks to the associative dimension of landscape values (i.e. the meaning of the landscape to people and the identity and sense of place connected to an area).

The intention statement for E1 expressed in the RMM Report does not align with the Operative District Plan (**ODP**) policy framework for Northlake. For example,

- the identified landscape and amenity issue of locating the urban edge to preserve the landscape values enjoyed from Lake Wānaka and the Mata-au.
- Policy 2.1 which requires the ODP Northlake Structure Plan (**SP**) to identify areas where buildings are prevented from occurring due to landscape sensitivity.
- Policy 4.1 which requires the SP to identify areas where buildings are inappropriate, including ridgelines, hilltops and other visually prominent landforms, and to avoid buildings within those areas.

The RMM Report is technically incorrect in this regard, which may have a bearing on the landscape effects analysis and conclusions.

<u>Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:</u>

- An updated landscape assessment that:
    - explains the ODP Structure Plan 'construct' or 'vision' for Northlake; and
    - The landscape assessment should make any consequential amendments to the assessment of landscape effects, in the context of this existing ODP policy context, particularly in terms of existing associative values and effects on the associative dimension of landscape values.

3. Identification of pest species

The RMM Report mentions (at Page 12) ridgeline conifers to the north of the REA, within the site.

An existing Northlake ODP provision (12.34.4.2.x) seeks that in Activity Area E1 and Activity Area E4 existing trees shall be retained and any additional enhancement planting, once established, shall also be maintained except that this rule does not apply to wilding tree species (particularly those spreading from the adjoining land outside the zone to the west) which shall be removed.

Policy 34.2.1.2 of the PDP seeks to ensure that the ongoing management of Radiata pine (Pinus radiata) is effective and can be practicably managed to avoid the adverse effects of the spread of wilding trees and degradation to the landscape. Policy 34.2.1.3 requires that any proposal for the ongoing management of Radiata pine consider the location and potential for wilding take-off, surrounding land uses, ownership of surrounding land, whether management plans are proposed, whether a risk assessment has been completed, to ensure the spread of wilding trees can be contained.

Wilding conifers are also an identified 'pest agent' in the Otago Regional Council Pest Management Plan (2019 – 2029), and the plan requires their long-term removal.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Whether the conifers are pest species; and
- If so, how they are proposed to be managed, given the requirements under the proposed PDP provisions.

4. Identification of landscape values within the site

The RMM Report primarily focuses on the Dublin Bay ONL and does not capture the landscape values of the full extent of the receiving environment (including the site). This is despite the RMM Report stating (at Section 4.4, Page 12) that it describes the 'landscape values of the receiving environment, *including the site.'* (my emphasis)

The RMM Report is technically deficient in this regard, which may have a bearing on the landscape effects analysis and conclusions.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- The Landscape Assessment consider whether this part of the RMM Report needs to be reviewed to more accurately describe the landscape values of the receiving environment, including the site.
- In particular, it is considered that section 4.4 should address:
    - the landscape values associated with the Mata-au Clutha River in the vicinity of the site;
    - the Rural zoned land to the north beyond the river (i.e., the Rural Character Landscape land to the north); and
    - the landscape values associated with the site itself. For example, as carefully configured urban development (in terms of its spatial pattern and provisions) to create: distinct areas of high-quality urban development interspersed with, and, in places, edged by, undeveloped areas (i.e., E1); a connected network of walkways and open space areas; and Tree Protection Areas.

5. Identification of the ONL boundary

The RMM Report explains (at page 13) that the key issue in identifying the ONL boundary is "*primarily visibility from Dublin Bay*". However, this statement does not align well with landscape assessment best practice as set out in TTatM (that the extent of an ONL relates to where the landscape values 'are', which includes consideration of perceptual values (including views), as well as physical attributes and associative values).

Furthermore, in terms of visual effects, the RMM Report also considers a far broader range of 'viewpoints' than just Dublin Bay, suggesting that the assessor does consider those other viewpoints to be important to at least some degree (noting however that the Paterson cross section analysis focuses on a single origin point in the Dublin Bay ONL, which is discussed further below).

The RMM Report is technically deficient in this regard, which may have a bearing on the landscape effects analysis and conclusions.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Clarification on whether views from the Deans Bank Track, the Mata-au Clutha River ONF more generally, along with the waters of Lake Wānaka and RCL areas in the vicinity are likely to be equally important, and if not, why not.

6. Mapping the ONL boundary

There is no legible mapping provided to support the statement (on Page 14) that the ONL line follows '*the geomorphological junction between the steep river escarpment or moraine and flatter pastoral plateau and also corresponds to the differences in vegetation cover driven by the underlying topography.'* Council considers this an important evidential gap.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

- Explanation as to how the proposed ONL linework responds to the vegetation cover and landform pattern referencing detailed, scaled, aerial photograph mapping with 1m contours, vegetation features (drawing from the ecological assessment) and the proposed ONF linework shown (including the Sticky Forest interface).
- This information request should also be read in conjunction with the more general additional mapping request below (including slope analysis and elevation mapping), as the current level of technical analysis supporting the proposed ONL boundary falls short of landscape assessment best practice.
- In this regard, the requestor's landscape expert (who was involved in the Sticky Forest Appeal) is encouraged to carefully consider the scope and level of technical analysis used to inform the ONL extent and boundary on the neighbouring Sticky Forest site (originally undertaken by Mr William Field of Boffa Miskell) and which followed through to the PDP ONL mapping for this part of the Northlake context. That work included slope analysis, elevation and visibility mapping from a series of external viewpoints.

7. Mapping to support landscape analysis

In response to the Graphic Attachment, and as explained above, additional mapping is required to support the landscape analysis, along with a clear understanding of the landscape effects of the proposed plan change.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

The following maps, to understand what is being proposed and therefore the effects it will have on the environment:

- Slope Analysis mapping, at a scale to support an analysis of the appropriate alignment of the ONL boundary and an understanding of the landscape values of the proposed REA.
- Contour and Vegetation mapping at a scale to support an analysis of the appropriate alignment of the ONL boundary and an understanding of the landscape values of the proposed REA.
- Mapping of the REA and its margins (adjacent properties with property numbers), on a scaled aerial base with contours, showing:
    - existing zoning;
    - proposed zoning;
    - proposed Structure Plan elements (e.g. walkway, bunding);
    - proposed ONL; and
    - proposed UGB (unchanged).
- A version of the Indicative Layout overlaid on the proposed Structure Plan, ONL and Zone layout.

8. Mitigation benefits of mounding

The potential mitigation benefits of mounding (discussed at page 15) are not thoroughly tested in the RMM Report.

The RMM Report assumes mounding *"up to 5.3m to 6.8m"* in height to manage visual effects for 5.5m high dwellings in the proposed LLR-A (red) area. The Report goes on to explain that the "*visual assessment assumes that conditions to achieve a lack of visual effects from the Dublin Bay ONL will form part of the future subdivision proposal and therefore the degree of visual effect is based on this assumption*".

However, the Paterson Cross Sections (page 15), relate to a single origin point on the lake and therefore provide little assistance in understanding the mitigation benefits of potential mounding in relation to the broader ONF/L and RCL context. Further, the potential landscape effects of mounding of this scale, in this specific location are not discussed in the RMM Report. Each of these matters comprise important evidential gaps.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Clear and thorough evidence on the mitigation benefits of mounding in this location, in managing landscape effects in relation to the surrounding ONF/L (and RCL) context. This would typically take the form of scaled Zone of Theoretical Visibility (**ZTV**) mapping, with the proposed REA development envelopes modelled into the base (digital terrain) model, along with the proposed mounding.
    - The ZTV mapping graphic outputs should:
        - distinguish between the potential visibility of the various REA development areas;

        - be constructed to test visibility from a series of points along the edges of the proposed development areas (rather than from a series of external vantage points); and
        - be accompanied by a thorough methodology statement
    - It is acknowledged that this sort of ZTV mapping requires expert interpretation (factoring in such matters as distance and the extent of built form likely to be visible) and would need to be examined alongside the RMM photographs and field work. However, it would provide a useful 'test' with respect to the scale of mounding likely to be required to achieve the 'reasonably difficult to see' policy requirement for ONF/Ls, much in the way that the Indicative Layout tests other aspects of the proposed zoning.
- An assessment of the landscape effects of the proposed mounding that will be required to manage landscape effects, as tested in the ZTV mapping above, including, consideration of how the mounding might affect: existing landform patterns and vegetation features; the amenity enjoyed within Northlake; and the landscape values of the nearby ONL.
- Consideration of whether any location specific provisions with respect to the mitigation mounding may be required to ensure an appropriate outcome given the proximity of this part of the site to the ONL (for example, minimum slope profiles, planting treatment etc, proposed contours on the Structure Plan).

9. Visual effects for viewpoint 3

The relevance of Beacon Point is not covered in the assessment of visual effects from viewpoint 3 (page 19).

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Explanation of the relevance of Beacon Point in an analysis of visual effects for Viewpoint 3.

10. ONL alignment with UGB

It is unclear why the approach to align the UGB with the ONL has not been adopted for the plan change area, where the proposed spatial arrangement creates a sliver of rural zoned land outside the proposed ONL along the northern edge of the site.

It is noted that the UGB follows the PDP ONL linework in other areas of the ODP Northlake Special Zone, where both are mapped. In the discussion of the PDP UGB provisions, the RMM Report (on page 35) explains that the REA is, at least in part, a response to increased housing demand. Although not necessarily the technically correct approach to determining ONL linework, the UGB typically aligns with the ONL around the urban areas of the district, due to housing demand and the need to maximise efficient land use.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please clarify why, in terms of effects on the environment, the approach has not been taken to align the UGB with the ONL in the plan change area and to exclude a sliver of rural zone from the ONL.

11. Rural Zone at ONL boundary

The RMM Report explains that the UGB maintains an area of 'open space' up to the proposed Dublin Bay ONL boundary, and that the 'open space' will act as an amenity buffer between urban development. The 'amenity buffer' referenced is Rural zoned land rather than an Open Space type zoning.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please clarify whether the RMM Report is premised on the land north of the UGB being rezoned as Recreation Reserve (or some other open space type PDP zoning such as Informal Recreation etc), and, if not,
- Please provide an evaluation of the effects of the sort of development that could be anticipated to occur on the (proposed) non-ONL Rural zoned land north of the UGB, as either a permitted or controlled activity.

12. Effects on existing properties

The RMM Report provides no comment with respect to the effects of the plan change on the landscape character and landscape values for existing properties on the existing urban development edges of Northlake, where the residential expansion is proposed. This is an important evidential gap.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

An evaluation of landscape effects in relation to dwellings at existing urban edge, where the residential expansion is proposed in terms of perceptual and associative landscape values.?

Infrastructure

Council has internally reviewed the Infrastructure Assessment Report, prepared by Patersons Land Professionals, and is requesting the following further information:

1. Stormwater servicing capacity

The Infrastructure Assessment concludes that stormwater can be appropriately managed and that downstream infrastructure has sufficient capacity. The assessment refers to a need for stormwater network upgrades while also indicating that stormwater will be managed on-site. The basis for the proposed servicing approach is unclear, with no soakage testing results, discharge locations, receiving environments or consenting requirements identified.

Council's Section 35 reporting also records ongoing stormwater discharge issues within the wider catchment, including discharges to the Mata-au and ORC enforcement action. In addition, stormwater assessment matters previously proposed through PC54 would no longer apply under the proposed planning framework.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please provide further information regarding the proposed stormwater servicing strategy, including:
    - clarification of the extent to which stormwater is proposed to be managed on-site versus reliance on reticulated infrastructure and network upgrades;

- the investigations and assumptions underpinning the proposed servicing approach, including whether soakage and infiltration opportunities have been assessed;
- identification of discharge locations, receiving environments and any ORC approvals or consents relied upon; and
- how the assessment has accounted for existing stormwater discharge issues recorded within the catchment, including discharges to the Mata-au, and how stormwater effects will be appropriately assessed and managed under the proposed framework, noting that the stormwater assessment matters previously proposed through PC54 would no longer apply.

2. Wastewater network capacity

The Infrastructure Assessment concludes that sufficient downstream wastewater network capacity exists to accommodate development enabled by PPC5. Council's pre-lodgement feedback identified more recent wastewater network modelling indicating downstream capacity constraints and the potential need for network upgrades. The applicant acknowledged that the differing modelling conclusions have not been reconciled.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please provide further information reconciling the conclusions of the Infrastructure Assessment with the more recent wastewater network modelling referenced in Council's pre-lodgement feedback, including whether any downstream network constraints, capacity limitations, overflow risks or infrastructure upgrades modify the effects of wastewater arising from development enabled by the PPC.

3. Water supply

The Infrastructure Assessment states that reservoir capacity will be reviewed at the time of detailed design and that additional storage may be required. To understand the infrastructure required to service the proposed plan change and the extent of any upgrades that may be necessary, please provide:

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Confirmation of the available capacity within the existing water supply network to service the proposed development, including storage and reticulation capacity; and
- Details of booster pump station and reservoir upgrades to accommodate the proposed development, including key design parameters, timing, responsibility for delivery and whether such works are assumed to be developer-funded or provided by Council.

Parks and Reserves

Council has internally reviewed the Landscape Assessment (Graphic Attachment), and Proposed Structure Plan and Zone provisions, and requests the following information:

1. Rural zoning along northern extent of boundary

The Proposed Standardised Zoning retains a section of rural zoned land at the northern boundary of the site.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please indicate what is proposed for the rural zoned land on the riverside of the UGB and the effects this will have on the environment
- Please consider the alternative of zoning the proposed rural zone land as informal recreation, and indicate the costs, benefits, efficiency and effectiveness of this proposal.

2. Trail connections

Lot 1000 (Northlake Stage 18) has already been vested with QLDC as local purpose reserve. The Northlake Plan Change – Indicative layout proposes that Lot 1000 will provide a trail connection to the future cul de sac. However, PPC5 proposes to zone both the lot and trail as suburban residential.



Figure 2: Lot 1000 shown in google maps aerial and in Northlake Plan Change - Indicative layout

Council requests the following information, pursuant to cl23(1)(b) of the First Schedule:

- Please consider the alternative of zoning Lot 1000 and connecting trail as informal recreation zone. Indicate the costs, benefits, efficiency and effectiveness of this alternative proposal.

Natural Hazards

Council has internally reviewed the Geotechnical Assessment, Ecological Assessment, Section 32, Assessment of Environmental Effects and Proposed Structure Plan and Zone provisions in relation to natural hazards. Council requests the following information:

1. Wildfire Assessment

The PDP definition of natural hazards relies on the RMA definition, which includes fire and its risk to human life, property, or other aspects of the environment (RMA s2AA). PDP objective 28.2 also identifies fire as a natural hazard that exists in the district. The NPS-NH does not apply to fire risk; however it provides for District Councils to manage natural hazard risk beyond the application of the NPS-NH, including risks from other natural hazards and activities not otherwise covered.

The proposal does not include a wildfire assessment and does not comment on the risk PPC5 proposes to wildfire, or the risk of wildfire to the PPC proposal. The s32 applies to the NPS-NH risk matrix to Geotechnical hazards only.

The REA adjoins Sticky Forest, a Douglas fir and radiata pine plantation (Ecology 3.1) and proposes 4.12 ha of new kānuka and grey shrubland near future homes. Kānuka, has also been documented in other QLDC Reserve Management Plans in nearby Mount Iron and Albert Town recreation reserves[1] as highly flammable and presenting a wildfire risk.

Council requests the following information, pursuant to cl23(1)(a) – (c) of the First Schedule:

- A short wildfire assessment by a suitably qualified person covering fuel types and slope, setbacks from existing forest and new planting, planting flammability, access and egress, fire-fighting water (FW2).
- Please consider possible ways in which any effects of planting on wildfire risk could be mitigated, and possible alternatives, including the potential for alternate species that present a lower wildfire risk. This may require consequential changes to the proposed subdivision chapter 27 provisions that mention 'grey shrubland'[2] to provide for alternate revegetation species.

2. Organic fill

Uncontrolled organic fill, over 16 metres at its deepest, lies in the centre of the investigation area and is "likely to be cost prohibitive to develop."[3] Further investigation is left to subdivision. The AEE places the fill mostly in land to be zoned Rural.[4]

Zoning land for housing where ground is likely unsuitable increases natural hazard risk and has bearing on the efficiency of the zoning.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please indicate where the deep fill will be located relative to the proposed residential zones and indicative lots.
- Please provide an overlay of the fill extent (legible Geotech App A) on the proposed zones and the indicative layout, with the engineer's confirmation, of whether any residential land is affected and the response proposed (for example a structure plan notation).

3. HAIL assessment and NES-CS pathway

The Preliminary Site Investigation (PSI) covers 20.61 ha and identifies HAIL A11 (Pindone baiting) and G5 (uncertified fill). It finds risk "highly unlikely",[5] so subdivision would be permitted under NES-CS reg 8(4), with soil Disturbance discretionary under reg 11.

Council requests the following information, pursuant to cl23(1)(a) of the First Schedule:

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[1] QLDC, Mount Iron Reserve Management Plan, adopted 17 April 2025, link and Albert Town Recreation Reserve Management Plan, adopted 4 October 2010, link
[2] For example, 27.3.3X.2; 27.3.3X.3; 27.7.33B discretion matter (e) and information requirements (bullet points 5 and 6)
[3] Geotechnical Assessment pp 8–9,

[4] AEE, p.8,
[5] PSI Table 1 p.6, 3.6 p.11, Table 3, pp.12–13

- Please confirm whether the PSI covers all land proposed for residential zoning, and if its conclusion accounts for every HAIL indicator found.
- Provide a plan of the PSI extent against the residential zones, including the C1 pocket;
- Provide confirmation from a suitably qualified and experience practitioner that the conclusion considered the deep fill (item 15) and the hydrocarbon stain, and
- Indicate the expected NES-CS pathway at subdivision.

Ecology

Council has internally reviewed the Ecological Assessment and the Assessment of Environmental Effects in relation to ecology. Council requests the following information:

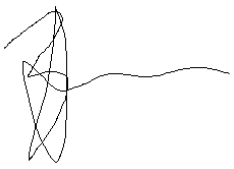
1. Clearance of indigenous vegetation and protection of habitats

The AEE has indicated that larger patches of indigenous shrubland have values that meet at least one significance criterion (in the NPS-IB) reflecting the presence of At-Risk vegetation.

Council requests the following information, pursuant to cl23(1)(a) and (b) of the First Schedule:

- Please provide a clear statement as to whether clearance of indigenous vegetation includes any habitat, which meets the significance criteria set out in the NPS-IB.
- Indicate how 'retained and planted areas' are to be protected long term.

Yours sincerely, Nāku noa nā



Emily Frew