

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

**UNDER**

the Resource Management Act 1991

**IN THE MATTER**

of a private plan change to the  
Queenstown Lakes proposed District  
Plan: Proposed Plan Change 1 The Hills  
Resort Zone.

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**STATEMENT OF EVIDENCE OF GRAEME MORRIS TODD**

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Dated: 20 March 2026

**STATEMENT OF EVIDENCE OF GRAEME MORRIS TODD OF  
ARROWTOWN, SOLICITOR**

- [1] I am a trustee of the Graeme Todd Family Trust (“the Trust”) which, with my wife, Jane Ellen Todd (“Jane”), are the joint proprietors of a property situated at 10 Advance Terrace, Arrowtown (“Todd Property”)
- [2] The Trust and Jane have filed a submission in opposition to parts of the Hills Resort Plan Change (“Plan Change”). I am authorised to give this evidence on behalf of the Trust and Jane .
- [3] That notwithstanding my involvement in planning matters in the district (and other parts of New Zealand) over the last 45 years, I give this evidence as a layperson.
- [4] Notwithstanding that, by way of background as a resource management lawyer, I have been involved in acting for the applicant in obtaining the original consents for the development of Millbrook Resort and Hogan Gully Farm Resorts as well as zoning for the later. I also acted for the Queenstown Lakes District Council in respect of the original consents for the golf course currently under construction at Parkins Bay near Wanaka.
- [5] I’m also a keen golfer. I am a former member of The Hills Golf Club, having elected to resign my membership in 2025, when the membership was restructured. I am a former member of the Queenstown Golf Club and currently a member and club captain at Millbrook Country Club.
- [6] In addition, I have played all of the local golf courses and many throughout New Zealand. Jane and I have also travelled extensively overseas and have played golf and stayed on golf resorts in Australia, USA, Fiji and South Africa.
- [7] Given the above, I believe I am sufficiently experienced to make observations as to my experience of resort golf courses and the amenities often associated with and the location of such within the same.
- [8] From the outset, Jane and I wish to make it clear that our submissions should not be read as any form of opposition to the existence of The Hills

or the aspirations of the current owners to redevelop the same. We both appreciate the very significant contribution that golf courses in our area make to the local economy in terms of golf tourism, places for recreation, residential opportunities (including significant contributions to the rating base of our District), employment and in the case of Arrowtown, green and open spaces to the edges to the town.

- [9] Our submission relates solely to the proposed location and potential use of the Sports Ground Activity Area (“SGAA”) and the extension of Activity Area 4.
- [10] In considering the proposal for both, we have been conscious that the proposed zone provisions do not in any way afford any protection for the majority of the existing mature vegetation that exists on The Hills site and the role, that such plays in providing significant screening of proposed development especially within the existing AA4 areas and the proposed extension of such.
- [11] Indeed, if such vegetation was to be protected and retained or at least until the planting within the AA4 LAMA grew to a point where it provided screening of development within the proposed AA4, our concerns in respect of the extension would be met.
- [12] As it stands, it could be a number of years before the planting within the LAMA provides any form of screening or at least “softening” of development within a AA4.
- [13] Notwithstanding the evidence that has provided such in response to other submissions . we note the requestor for the Plans Change has not provided any computer simulations of the effects of the proposed development within the extended AA4 with the existing planting removed. The only aid you have for assessing the effects of such development are a limited number of height poles which hardly afford you the opportunity to assess the bulk of such development within such Activity Area and the effects of such when viewed from outside the resort.
- [14] Turning to the proposed SGAA, the Section 42 “evidence” and the evidence for the applicant totally misunderstands and does not respond

to our submission. No where in the same do we mention that we are concerned about the visual effects of development proposed within SGAA especially so when viewing from our property.

[15] Our primary concerns, relate to the siting of the Activity Area and the potential uses of such based on the requestors proposed rules for the SGAA as originally notified.

[16] Mr Brown and his evidence for the requestor, has acknowledged a number of these concerns and proposed a number of amendments to the rules which would make it more difficult (but not impossible) for activities, which could have effects on our amenity including cumulative effects to arise.

[17] I mention cumulative effects as we and our neighbours already experience adverse noise effects from the use of the commercial functions venue recently established on the Monk property immediately opposite the entrance to The Hills and below and south of the Advance Terrace escarpment . The council in granting consent to that venue had accepted evidence from the applicant's acoustic experts that with the mitigation measures proposed and the noise limits provided for in the District Plan , we and our neighbours would not be affected by noise associated with its use.

[18] Suffice to say this has not been our experience and notwithstanding the evidence provided by Mr Day for the requestor for the Plan Change, we are concerned that with certain activities allowed by the rules for the SGAA we will have a similar experience, especially on still, summer evenings when we choose to have our bedroom windows open at night.

[19] Mr Day's evidence is predicated on activities that might be undertaken in the SGAA being:

- (a) limited to members (and their guests) of The Hills Golf Club;
- (b) a likelihood of a maximum of only 50 people being on site within the SGAA at any one time;
- (c) there only being background music from a Bluetooth speaker;

- (d) the only licensed facility being a food truck;
- (e) his experience of similar facilities at Tara Iti and Te Arai Links being “sister” golf resorts to The Hills and located north of Auckland.

[20] What Mr Days (and the other evidence for the requestor) does not disclose is:

- (a) the rules for the SGAA do not limit the use of the SGAA to members of The Hills and their guests;
- (b) there is no limit imposed by the rules as to the number of persons who can use the SGAA at any one time;
- (c) there is no restriction on the type of amplified sound or music that may be used;
- (d) there is no restriction that only a food truck can serve alcohol;
- (e) there is no restriction upon the whole SGAA being a licensed area which would enable marquees or other temporary structures as for example seen at events like The New Zealand Open Golf Championships being erected within the SGAA;
- (f) from my visits to both the Tara Iti and Te Arai Links resorts I can confirm both are located rural areas, some many kilometres away from suburban density development unlike the relatively close proximity of Advance Terrace to the proposed SGAA. Further the area similar to the SGAA at Te Arai Links is located relatively close to residential development within the resort ;
- (g) potential cumulative effects rising from other venues in close proximity such as the Monks functions facility;
- (h) as to why the SGAA could not be located elsewhere within the zone, especially given the types of facilities it is proposed to provide which would normally in similar resorts be located nearer to other commercial type facilities (e.g. clubhouse, restaurants, golf training facilities, established toilets, car parking etc) where the resort management is normally located allowing effects to be

managed and well away from neighbouring properties adjoining the edges of the resort zone .

- [21] Indeed, if we accept the evidence about the minimal effects that might arise from the SGAA, one wonders why the SGAA and its facilities need to be located so far away from the other resort communal facilities and more importantly in terms of future use, so close to the adjoining public road providing access to other potential users of such SGAA who may not be otherwise associated with the Resort either as members or residents .
- [22] I am of course reluctant to question the requestors stated “intentions” for the development and use of the proposed SGAA and the intended extent as such, but as we all know, ownership and even management can change and future owners may have totally different “intentions”.
- [23] As suggested by Mr Brown the Temporary Activities rules of the District Plan would allow much less restricted activities to occur on the land proposed to be zoned SGAA.
- [24] Whilst that might be so, no such activities have occurred to date on this site and the proposed location and establishment of facilities such as toilets and presumably utilities such as reticulated water and electricity which one would assume will be established would only serve to “attract” use of the site even if it was for temporary events.
- [25] In conclusion, we can see no valid reason why the SGAA should not be relocated to somewhere more central within the proposed resort zone and that you can not and should not rely on “intentions” of the requestor for justifying the siting of the SGAA in its proposed location.
- [26] In all other respects, we rely on the evidence that is to be given in support of our submission by Mr Galloway.

Dated: 20 March 2026

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Graeme Todd