

**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

**ADDENDUM TO SECTION 42A REPORT OF CRAIG ALAN BARR
ON BEHALF OF QUEENSTOWN LAKES DISTRICT COUNCIL**

Response to Minute 2

18 March 2026

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1. QUALIFICATIONS AND EXPERIENCE

- 1.1 My full name is Craig Alan Barr. I have been engaged by the Queenstown Lakes District Council (**QLDC/Council**) to prepare a report on the Proposed Hills Resort Zone private plan change request for the purposes of section 42A of the Resource Management Act 1991 (**RMA**).
- 1.2 This brief of evidence has been prepared as an Addendum to my s42A Report dated 13 February 2026 (**s42A Report**).
- 1.3 My qualifications and experience are set out in my s42A Report at paragraphs 2.3 to 2.7.

2. INTRODUCTION

- 2.1 This brief of evidence responds to paragraph 4 of Minute 2, issued by the Independent Hearing Panel (**Panel**) on 6 March 2026, which states the following:

We thank the Council for its evidence. However, this did not include the s.32 evaluation supporting the evidence which we would normally expect to be included as part of the Council's s.42A report. As a result, we direct that the Council provides us with the full copy of the section 32 evaluation by the 12.00 noon 13 March 2026 forming part of a single s.42A report with the Council's planning evidence.

- 2.2 As outlined in my s42A Report at Section 6, a s32 evaluation has been undertaken by the Requestor and was included with the notified proposal. Whilst Minute 2 refers to s32 of the Act, I have inferred that the Panel is seeking additional s32AA evaluation on the changes to provisions recommended in my s42A Report.
- 2.3 In my s42A Report at paragraphs 6.5 and 6.6 I set out the requirements of s32AA of the Act. As this evidence is an addendum to my s42A Report, it should therefore be read in conjunction with that report. I have however, expanded on these matters as it relates to my recommended amendments to the proposal that would result in changes to the operative Proposed District Plan (**PDP**) provisions.
- 2.4 I have also read the evidence filed by the Requestor on 13 March 2026, and in

particular the planning evidence of Mr Brown. I note that this addendum is not rebuttal evidence, and that there is the opportunity for the Council to file any rebuttal evidence as a separate matter. Therefore, this addendum does not specifically refer to any of the Requestors' evidence or rely on the Requestor's position.

3. SECTION 32AA EVALUATION – ADDENDUM TO S42A REPORT

- 3.1 Section 32AA evaluations are to contain a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Therefore, recommendations in my s42A Report on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.
- 3.2 I consider that my recommended changes relate to landscape, traffic and planning matters, and that when forming my recommendations, I have been adequately informed by Ms Gilbert on landscape matters¹ and Mr Facey on traffic matters² (in addition to the information provided by the Requestor). I do not consider my recommended amendments to require any other technical expert advice (such as economic or ecological advice) to assist with a s32AA further evaluation.
- 3.3 This addendum provides further s32AA evaluation to accompany the following recommendations, as identified in my summary at paragraph 1.8 of my s42A Report (hereinafter collectively referred to as my recommended amendments):
- (a) Amendments to the Structure Plan (and amendments to any relevant plan provisions as necessary) to reduce the collective landscape effects of Home Sites 9-16, including the reconsideration of building heights, the Landscape Amenity Management Areas (**LAMA**) and the proposed new Structural Planting Area (**SPA**) strategies;
 - (b) Additional planting in relation to Submitter Simon Dan's (#15) property associated with visual mitigation of the walkway/cycleway where it is located near his property at 214 McDonnell Road;
 - (c) Amendments to Policy 47.2.1.14 (landscape and amenity) to provide a

¹ Statement of Evidence of Bridget Gilbert, 13 February 2026.

² Statement of Evidence of Antoni Facey, 13 February 2026.

causal link to new rule 47.5.23 associated with limiting the number of dwellings utilising the eastern Hogans Gully Road access;

- (d) The Structure Plan is amended so that the eastern Hogans Gully Road Access is located eastwards from its current proposed location as recommended by Mr Facey;
- (e) A new staging rule is recommended to be introduced which requires a minimum 14 visitor accommodation units be constructed within the dedicated visitor related activity areas (A1, A3, A6 and C), before HSs 6-16 can be developed; and
- (f) The Structure Plan is amended to show the walkway/cycleway trail over Lot 6 DP 392663 (the adjoining site to the south-east corner of the Zone also referred to as the Boxer Hills land).

3.4 At paragraph 1.8 of my s42A Report I recommend at (g) to retain a reference in Rule 27.7.2.2(d)(ii) to auditing by the Council at no sooner than 6 months in relation to subdivision, at (h) that the notified deletion of rules 47.4.5, 47.4.7 and 47.4.22 be rejected. At (i), I recommend that the notified amendments to Rule 47.4.10 that would remove the requirement for AA S1 and S2 being in the same ownership as AA C and AA G be rejected. These recommendations are to retain the operative provisions in The Hills Resort Zone (**THRZ**) Chapter 47 and therefore do not require a s32AA further evaluation in relation to the retention of existing operative provisions.

4. SECTION 32AA

4.1 In accordance with s32AA(1)(a), a further evaluation is required in respect of my recommended changes to the notified proposal since the s32 evaluation was completed. In this evaluation:

- (a) The 'notified proposal' is that proposed by the Requestor (being the notified proposal and the modifications proposed by way of letter dated 15 January 2026 relating to the eastern Hogans Gully Road access).
- (b) The 'recommended version' is as per my recommended amendments identified in the s42A report.

4.2 Section 32AA(1)(b) states that the further evaluation must be undertaken in

accordance with s32(1) to (4) of the RMA, while s32AA(1)(c) requires that the level of detail must correspond to the scale and significance of the changes.

4.3 Under s32(1)(a) the evaluation must examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the RMA. In the context of this proposal, and the nature and scale of it and my recommended amendments, the purpose of the RMA is achieved by the PDP objectives, namely THRZ Objective 47.2.1 and the relevant PDP Strategic Directions provisions identified in my evidence. As noted below in relation to s32(3), my recommended amendments do not change the objectives of the proposal as originally requested. Rather, the matter at issue relates to what the most appropriate provisions are to achieve the objectives, which is addressed as a requirement of s32(1)(b).

4.4 Section 32(1)(b) requires an examination of whether the provisions of the proposal are the most appropriate way to achieve the objectives by:

- (a) identifying other reasonably practicable options for achieving the objectives,
- (b) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
- (c) summarising the reasons for deciding on the provisions.

4.5 Section 32(2)(a) requires as part of the examination under s32(1)(b)(ii) (assessing the efficiency and effectiveness of the provisions) that the assessment 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.*

- 4.6 The following assessment focuses on the effectiveness and efficiency of the provisions, but I do not consider the scale and significance of the changes to require an assessment in terms of matters under s32(2)(a)(i) or (ii), nor (b) or (c).
- 4.7 As noted previously, under s32(1)(c) the evaluation is to 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. The following further evaluation has been undertaken in this context, and as provided for by s32AA(1)(c), in relation to the level of detail that corresponds to the scale and significance of the changes.

5. REDUCTION OF ADVERSE LANDSCAPE EFFECTS OF HOME SITES 9-16

- 5.1 Based on the advice of Ms Gilbert, I recommended amendments to the Structure Plan (and amendments to any relevant plan provisions as necessary) to reduce the collective landscape effects of Home Sites 9-16, including the reconsideration of building heights, the Landscape Amenity Management Areas (**LAMA**) and the notified new Structural Planting Area (**SPA**) strategies.
- 5.2 Other reasonably practicable options include the removal of these Home Sites from the Structure Plan and related provisions. However, I have inferred from Ms Gilbert's evidence that reducing the adverse effects on landscape character of the Home Sites proposed in this part of the THRZ are not insurmountable, but with further refinement additional residential activity could be appropriate in this part of THRZ. Therefore, the option of removing these Home Sites is not recommended as another option.
- 5.3 In terms of the efficiency and effectiveness of the provisions, I note that the framework to manage landscape effects in THRZ are already proposed or exist, being the identification of Home Sites (as a tool to manage the location of buildings and residential activity), and the accompanying LAMA and SPA provisions. The key management framework is already in place, with my recommendations forming refinements to the Structure Plan and provisions.
- 5.4 Recommendations to increase the SPA areas and provide greater earthworks and

landform modification to locate buildings in more visually recessive locations result in higher costs for the Requestor. However, this can be accommodated without the removal outright of any Home Sites.

5.5 Therefore, the costs to the Requestor are not significant, and my recommended amendments would result in changes that are not significant while providing for effective provisions which are the most appropriate way to achieve the objectives of the proposal.

6. ADDITIONAL PLANTING IN RELATION TO SUBMITTER SIMON DAN'S (#15)

6.1 In my s42A Report I recommended³ additional planting associated with visual mitigation of the walkway/cycleway where it is located near Submitter Simon Dan's (#15) property at 214 McDonnell Road.

6.2 This method would likely result in a requirement for additional planting shown on the Structure Plan or by way of a rule associated with the formation of the cycleway and would be a cost to the Requestor to install and maintain this planting.

6.3 I consider this amendment to be a small cost in the context of the proposal and what is likely the Requestor's overall intentions to provide for a public access cycleway/walkway as is currently the case with the operative provisions, but manage this feature in relation to the operation of the resort from a golf operation perspective, and to install additional planting adjacent to the Submitter's dwelling. Therefore, the recommendation is not to move the location of the cycleway/walkway, but to provide plantings to maintain privacy to the submitter.

6.4 Another reasonably practicable option includes the relocation of the walkway, although I understand from Mr Dan's submission that the focus was to provide additional screening, rather than the relocation of the walkway. I consider that greater provision for screening rather than relocation is the preferred option.

6.5 Therefore, the costs to the Requestor are not significant, and my recommended

³ Statement of Evidence Craig Barr, 13 February 2026, at [10.18].

amendments would result in changes that are not significant while providing for effective provisions which are the most appropriate way to achieve the objectives of the proposal.

7. INTENSITY OF USE OF THE EASTERN HOGANS GULLY ROAD ACCESS

- 7.1 In my s42A Report I recommended amendments to Policy 47.2.1.14 (landscape and amenity) to provide a causal link to new rule 47.5.23 associated with limiting the number of dwellings utilising the eastern Hogans Gully Road access⁴.
- 7.2 My recommendations are to provide a policy to assist with decision making guidance at the time of resource consent. I note that the eastern Hogans Gully Road access was proposed as part of the notified proposal, with a further refinement proposed to limit the use of the access proposed by the Requestor as a response to the Draper submission, with modifications to the proposal made on 15 January 2026. I do not consider this recommendation to result in any greater costs, but merely to ensure that the effectiveness of the provisions from a plan administration perspective are complete.
- 7.3 Therefore, I do not consider there to be any costs to the Requestor associated with the amendment to Policy 47.2.1.14. Rather, this amendment makes a small but worthwhile increase in the effectiveness of the provisions.

8. LOCATION OF THE EASTERN HOGANS GULLY ROAD ACCESS

- 8.1 In my s42A Report I recommend⁵ that THRZ Structure Plan is amended so that the eastern Hogans Gully Road Access is located eastwards from the location shown in the notified Structure Plan, as recommended by Mr Facey.⁶
- 8.2 Other reasonably practicable options are to remove the access and require all Home Sites to access THRZ via McDonnell Road. However, I note that Mr Carr supports the location shown on the notified Structure Plan and Mr Facey supports the access albeit relocated eastwards. Therefore, this option would be considered

⁴ Ibid at [11.9].

⁵ Ibid at [11.12].

⁶ Statement of Evidence of Antoni Facey, at [1.3] and [3.1]-[3.19].

an excessive measure which is not consistent with expert advice received from Mr Carr nor Mr Facey.

- 8.3 In a s32(1)(b)(ii) context and assessment of the efficiency and effectiveness of the provisions, this change is considered to be small, but with the advantage of improving sight distance from this access onto Hogans Gully Road. This change is also more efficient as it avoids a conflict with the Structure Plan in terms of the current location of the access and the potential for a lack of support for the location at the time of future resource consents and detailed design.
- 8.4 Therefore, the recommended alternative location in my s42A report has improvements in terms of the effectiveness of the provisions as they improve a potentially deficient sight distance outcome at the plan preparation stage (rather than leaving this for the plan administration stage).
- 8.5 Costs may arise from the revised access enhancing or exacerbating landscape effects, but these are not known until such time as the Requestor identifies an alternative access location onto Hogans Gully Road, and how any alternate access aligns with the current accessway into the site toward Home Site 15.
- 8.6 Therefore, I consider that any costs to the Requestor are small, but the benefit is that there is an increase in the effectiveness of the provisions (and to road safety).

9. STAGING RULES

- 9.1 In my s42A Report I recommend⁷ that a new policy is added under Objective 47.2.1 and a staging rule be introduced (a rule in Section 47.4 located within the 'Visitor Accommodation' section), which requires a minimum 14 visitor accommodation units be constructed within the dedicated visitor related activity areas (A1, A3, A6 and C), before Home Sites 6-16 can be developed. This in my view will ensure that the plan change achieves Objective 47.2.1.
- 9.2 From a s32(1)(a) perspective, other reasonably practicable options are to dispense

⁷ Statement of Evidence Craig Barr, at [14.20].

with these provisions, which I do not support for the reasons set out in my s42A Report at paragraphs 14.1-14.8.

9.3 Another option could be to increase the requirement for a minimum amount of visitor industry activity to be established within THRZ prior to the development of Home Sites 6-16 than the 14 visitor accommodation units I have recommended in my s42A Report. In relation to this, in my s42A report at section 14 I set out in some detail how other resort zones (the Gibbston Valley Resort Zone and Hogans Gully Resort Zone) operate in terms of staging provisions which require that that particular zone to achieve integration of residential activity with visitor industry and resort to ensure they remain consistent with the intentions of the PDP for resort zones.

9.4 I consider that the rule recommended in my s42A Report is consistent with that applied to another PDP resort zone, being the Hogans Gully Resort Zone, which requires a minimum amount of visitor industry activity to be provided prior to the development of residential activity that could be perceived as not being integrated with a resort development.

9.5 I consider that the assessment at paragraphs 14.1 to 14.23 of my s42A Report adequately examines the efficiency and effectiveness of the recommended provisions to achieve the objectives in terms of s32(1)(b) and adequately summarises the reasons for making this recommendation. I do not repeat that assessment but offer the following summary:

- (a) While THRZ does not currently have any staging provisions to ensure that residential activity is undertaken sequentially to ensure it remains proportionately low to onsite visitor related activities, at the time THRZ was promulgated it was not proposed to remove the recently established 9-hole golf course and distribute eleven dedicated homesites into an open space area, which is located within a separate landscape catchment to the majority of the resort⁸.
- (b) The dispersal of residential activity into the southern rolling hills of THRZ, replacing parts of AA G and the 9 hole golf course results in a rural

⁸ Ibid at [14.8].

residential pattern of development which, further exacerbated by the access onto Hogans Gully Road, creates the potential for a perception that Home Sites read as rural living sprawl and more associated with the Speargrass Valley visual catchment, than being integrated into the resort⁹.

- (c) The current (operative) Structure Plan has five separate Home Sites, three of which contain existing dwellings that were established and landscaped prior to the promulgation of THRZ. The proposed new Home Site 6-16 configuration is a substantial departure from the current THRZ framework¹⁰.
- (d) There is the potential for the plan change to not achieve Objective 47.2.1 and to not be consistent with the PDP's definition of resort from proposal's request to establish 11 new Home Sites without any visitor industry activity establishing first. While there are consents in place there is no assurance that they would be implemented¹¹.
- (e) Mr recommended policy and staging rule¹² will help ensure that the residential activity remains low as a proportion of the overall development focused on visitor activity, and that the obligation to establish those 14 visitor accommodation units are commensurate to the scale of the overall development and would not place significant costs on the Requestor¹³.

9.6 I also consider that because of the purpose of the Zone as set out in Section 47.1 *'enable high quality on-site visitor activities and resort facilities, within a golf course setting and with a predominance of open space'*, a requirement to establish a minimum of 14 dedicated visitor accommodation units prior to the development of residential units in Home Sites 6-16 is not a significant cost, if a cost at all.

9.7 This is because the plan provisions already contemplate visitor accommodation activity in these locations, and the provision of 14 visitor accommodation units is

⁹ Ibid at [14.9].

¹⁰ Ibid at [14.10].

¹¹ Ibid at [14.16].

¹² Ibid at [14.20].

¹³ Ibid at [14.11]-[14.15] and [14.18], [14.19] and [14.22] and [14.23].

well within the maximum provided for in the Zone of 150 units total (inclusive of residential units and visitor accommodation units) as required by operative Rule 47.5.15. Therefore, I do not consider the proposed new policy and rule to create significant efficiency issues associated with its implementation. While these provisions are considered to be effective at ensuring the proposal where it is increasing the offering of residential activity in a dispersed location will better achieve Objective 47.2.1 and the PDP's definition of resort.

10. WALKING AND CYCLING CONNECTION OVER LOT 6 DP 392663

- 10.1 In my s42A Report I recommend¹⁴ that the Structure Plan is to be amended to show the walkway/cycleway trail over Lot 6 DP 392663 (the adjoining site to the south-east corner of the Zone also referred to as the Boxer Hills land).
- 10.2 Other reasonably practicable options are to retain the status quo and leave any provision for a future walkway/cycleway in the Hogans Gully Road reserve. While I have not received traffic advice on this matter, I understand that it is preferable that trails are located away from the edge of the road carriageway where practicable, and this plan change represents an opportunity to assess this matter and the submission from the Queenstown Trails Trust.
- 10.3 Amendments to THRZ provisions are limited to the identification of the indicative trail location on the Structure Plan. This may result in efficiency costs/issues for the Requestor associated with the provision of a public trail over that part of THRZ, and through Lot 6 DP 392663, which is currently used for farming of a low intensity grazing use (but the land is subject to a proposal to rezone the site to enable residential activity).
- 10.4 Without any impediments yet to be identified by the Requestor, my initial view is that a walkway/cycleway over this land as recommend in the Queenstown Trails Trust submission would result in the potential for an enhancement of the trail network without significant costs or adverse effects on the Requestor's use of this part of THRZ and Lot 6 DP 392663.

¹⁴ Ibid at [12.4].

10.5 In this context, my recommendation to include a walkway/cycleway over these areas as sought in the Queenstown Trails Trust submission would more effectively implement THRZ Policy 47.2.1.4, and PDP Strategic Policy 3.3.27 which is to 'seek opportunities to provide public access to the natural environment at the time of plan change, subdivision or development'.

11. CONCLUSION

11.1 On the basis of the analysis set out in this addendum brief of evidence, I recommend that the changes to the notified proposal outlined in my s42A Report be accepted by the Panel. I consider that if the Panel accept my recommendations, then this can be referred to in the decision-making record to satisfy s32AA(1)(d)(ii) of the RMA as a further evaluation to demonstrate that the further evaluation was undertaken in accordance with the requirements of s32AA.



Craig Barr

18 March 2026