

QLDC Blue Green Network Plan Feedback

Florence Micoud - Wānaka - 20 October 2025

Thank you for this important work and excellent report, long!

Excellent mahi, going in the right direction, awesome values (page 10) but too narrow, not bold enough for the climate biodiversity and unaffordability crises we are in. Scientists are clear that we need to halve our emissions, all of us, each of us by 2030. Then halve again by 2040. So that we are carbon neutral by 2050. This is the only chance for the planet Earth to not overheat, thereby giving a chance to civilization to not die of resulting destruction and pollution. The beauty of it is, by addressing the climate effectively, we also nurture biodiversity and improve inequalities. Win win win. The blue green plan is the opportunity to do it. The report is an excellent awareness starting point. I contribute a few points below and hope they are useful.

It's 2025 and we need to go strongly for it! A lot of time has been lost already. The current rules and regulation allow exploitation and destruction of what we do have. Major change needs to happen from today and the Blue Green Plan is a last chance to make this bold change, let's not once again miss it -just to not stir the status quo. We need to be generous.

I believe that everyone who is a blessed guardian of a part of the land, grateful kaitiaki of piece of the Earth Papatuanuku has the responsibility:

- to dedicate, protect and regenerate 30% of the land, by 2030 ([30x30](#) campaign [Why we need 30x30: Protect 30% of land & water by 2030](#))
- to keep all the trees and grow many diverse trees. Widening the Public land tree protection policy to private land, as it is important to stop cutting trees for nothing, with ban on clear felling.
- to share the land crating commons to enable to grow our food locally
- to open biodiversity enriched parks to connect and allow commuting, in a zero carbon way
- to care for precious water, using no chemicals, allowing no effluents to leach and using it sparingly.

Our wellbeing depends on nature [360 metre away from us](#), not 1 hour of driving. We need access to nature right here, we need trees right where we live. Birds need these mature trees too. Not in 20 years, now. We have these mature trees, alas they are on the chopping block.

The plan is not strong enough to protect what we have, and we can't afford to delay. It's the perfect timing to act, as when suburbia is built, it's too late. In this district, we have all the people and many initiatives already working towards this sustainable, resilient beautiful world. The WAO summit is coming up to launch the conversations. It's already happening.

Yet, the growth-growth perspective, unchallenged in this report, is overcoming environmental carrying capacity (pollution, water supply) and social licence (the community in Wānaka always say they don't want more growth). I attended countless meetings organised by the Council where participants asked to stop the growth. We came to live in Wanaka because it is a village. We are not interested in traffic jams and suburbia. I understand some business people want growth, but most of us in Wanaka came here for the lifestyle. We chose a village lifestyle and want to keep it that way, and see it degrading year after year. This is the reason we are upset with the QLDC and Queenstown approach of growth, it is not what we want (or we would live in a city).

The current policies allow bulldozer exploitation, destruction of the land and mature trees, all degrading locals' wellbeing...

So the Blue Green plan is really the lever of the choice we make now: protect all there is around the urban area and develop further away. We cannot continue suburbia, the existing urban area in Wanaka is wide enough. Instead develop satellite little towns (Cardrona, Luggate...) with all the services and well developed public transport connecting liveable small urban centres.

Blue Green plan is the chance to change regulations required to create this low carbon resilient world before the land is built up. Real action at the scale required depends a lot on the Council, so please be fantastic, make it beautiful! And please don't miss the opportunity!

Page 3 Executive summary comments

Paragraph 1 is awesome, I like that Kāi Tahu is involved, the graph is inspiring.

I suggest to acknowledge from the start that no reserve is existent in the areas opening for development, since these lands are all private. This is the reason why the blue green corridor work must happen.

Paragraph 2 In the sentence starting with " This will help minimise fragmentation of", please add "opportunity for local food growing and fosters carbon zero communities".

Paragraph 4 " As land and/or development opportunities arise, it allows communities and developers..." Please add residents. I believe it's important to put residents at the heart of this report. We residents are the most concerned about planning and urban development. Our quality of life depends on it, as well as the bird chorus (supporting me right now with their beautiful singing while I write this to defend the trees and the birds!) And residents are the ones who pay the tax so the report is for them, so I warmly thank you for giving me the opportunity to give feedback.

Page 4

Nice and clear to me

Page 6

This is excellent " *'Grow Well Whaiora – in the pursuit of wellness' through development that protects and enhances natural environment function and public open space networks*" Please note the word PROTECT here. At the moment, nearly nothing is protected in the priority areas and the Blue Green plan must address that.

Note and Disclaimer Comment

"The Local Blue Green Plans are a response to current strategies, policies and plans. While some gaps have been identified in these higher-level documents, the Local Blue Green Plans do not assume that updates will be made to address these gaps, though future policy development work might recommend revisions for adoption." I think that is where it fails. The recommendations by such a detailed researched process should be adopted, as they include community consultation. The Council should be here to implement what the community wants and thereby make the revisions.

Please inform me of the link to *"the latest versions of these documents for current policy direction"*, I look forward to see how change is embraced.

"The Local Blue Green Plans are based on the Priority Areas and Settlements in the QLSP. The boundaries for these urban areas are not well-defined" Please contact us to discuss boundaries with you for our area. (Wānaka South)

Page 7 Column Green Network

In ecological corridors, please define width. I know from the science I have read before that to be effective an ecological corridor must be discontinued and WIDE. 300m minimum I remember for birds to feel home etc. Nature needs ample space. Let's be magnanimous.

In community networks

Track and trails: Add **commuting**, very important to commute by bike in a carbon zero society, see Netherlands. It requires wide trails. As a biker and as a walker, I do not like shared trails, not safe enough to be adopted by most -as we need it to happen. So when we design an urban area, we must include separate bike/micro mobility users and footpaths. Also very important to connect the subdivisions, no dead ends should be allowed and when possible, dead ends should be reopened to walk/bike. Good to see on page 33 that the Council is aware of it “ *Several smaller private developments have not considered open space and trail connections to adjacent areas, resulting in a cumulative deficiency and lost opportunities for connectedness that supports ecological and community outcomes.*” Why did the Council grant the consent in the first place? This connectivity must be enforced as part of the rules of subdividing, along with compulsory large reserve provisions, as recommendations are not sufficient.

Please add

Local food production area: be it common gardens or plots, a social enterprise using private land to grow food for the market, pastures for community cows, food forests, orchards...

Local timber production, for house and firewood, community managed, carbon absorption...

So really we need landowners ready to share part of their land to allow that to happen. We need a discussion of the council with landowners to discuss what would make landowners want to participate in this beautiful blue green picture? We have a piece of land that we are open to share and have been inviting the council to discuss for years. We still hope.

At this point in the report, a call for action would be dynamic, for example add: “Do you have a piece of land and have some left after your own needs? Can you share?” “What would make you want to participate in this blue green network?”

Page 8

“*Upper Clutha communities have opportunities for direct and indirect access to the natural environment.*” Add “and it is shrinking very fast -because of the current rules”

“*Provides for increased resilience to climate change*” Add grow local food and resources, commute carbon free. Yes it definitely would be a wonderful asset for locals and tourists alike to create a substantial blue green network, we have a good base and there is still plenty of land on the outskirts of town, so plenty of scope - but shrinking.

Page 9 KĀI TAHU

I really like Kāi Tahu and the fact that they work towards the Blue Green plan, based on their values. I am a pakeha and am strongly connected with Papatuanuku. I love caring for our garden in harmony with nature. I am a grateful guardian kaitiaki of the part of land we are lucky to “own”. So the values are true with me and I trust they can achieve a sustainable system for both people and the planet.

Page 10

Principles are very good. The Dawn chorus objective is missing from the document whereas it was one of the principles of QLDC district plan, along with wellbeing and resilience. Please add Dawn chorus in Blue Green plan and make sure it is protected wherever the dawn chorus already exists, eg. south of Studholme road Sth.

From Page 12

I only comment from the Wānaka perspective. The South Wānaka area is our backyard, so we care. Page 14- Map out links between Hawea Luggate Wānaka, otherwise, it already feels disconnected

Page 15

Growth - I already commented on that, it is not wanted, it is not sustainable. Instead of planning for growth, at least plan for capping the growth, there is a sustainable steady state that we should aim at. Growth is by essence destroying what we have.

The growth that does happen MUST absolutely, from today, be done in a sustainable way.

“Comprehensive greenfield development can provide opportunities for rehabilitation of waterways and creation of new recreation connections and green open spaces, this can often be lost with incremental urban expansion.” This is the core of the issue this Blue Green work is addressing. If we are honest with creating change, please correct to “comprehensive greenfield development ~~can~~ WILL provide opportunities for rehabilitation of waterways and creation of new recreation connections and green open spaces, this ~~can often~~ WILL NOT be lost with incremental urban expansion.”

This is achieved by allowing consents only to projects keeping 30% for nature, well connected, with ample food growing land, keeping all the existing trees, managing water and fostering biodiversity. Why settle for less?

The Council is the entity delivering authorisation, so it can be done. I understand the need for densification, there are many examples of sustainable intensive urban areas with energy efficient green buildings, shared green food growing space etc. There again, it must be imposed on the developer as a consent rule. At the moment, I understand it is optional for the developer to keep reserves, he can just pay for it. Considering the price of the square meter, concrete always wins on trees. But money is no longer the criteria in a climate and biodiversity crisis. And we are no longer at a place where we can afford it.

This report is currently shying away from exposing that necessary change and needs to be strengthened.

Public open space is another way to achieve sustainable growth, but it requires the ratepayers to “buy” a piece of nature they already had, the real charge should be to those who take it away, that is the developer.

Discussing with landowners for voluntary participation (as mentioned above) is another way to achieve it.

The report says this development is happening in the next 30 years, that is now, so the rules must change now, or it will be too late.

Please note, I was present at The Grow Well Waiora workshop in Wānaka in 2019. It was an example when all the tables but one raised their hands to stop Wānaka growth to where it was then, and develop satellite towns (Hawea, Luggate, Cardrona...) with good connections. I even remember that people from the one table who voted to grow wanaka were booed!

When the report was published in 2022, it disappointedly pushed existing prediscussed boundaries to the outer geographical limit. This was not what was approved. In the case of Wānaka South, the limits are currently orchard road. To the South, there is still an expanse of flat rural land. This is a unique opportunity to create this essential food and resources growing area for Wānaka. It would be wrong to allow intensive urban development here. I invite you to climb on Huia terrace or Birdsong rise to admire this expansive area of large trees, full of birds. We discussed it with the Council many times and as part of the Landscape schedule. It doesn't mean that no house can be added there, only keeping the rural look and use.

Page 18 Literary review

It's important to also liaise with:

- Local Food group The Southern Lakes Kai Collective. They are looking for land to grow local food and ways to foster this. They are considering a Foodland Trust. I hope the Council will foster their initiatives. Landscape schedules work

Page 27

“Wānaka South remains a large undeveloped greenfield priority area, currently in large rural and rural residential lots” It is developed as landowners have chosen it to be. They bought land in a rural lifestyle zoning

to ensure they live a rural lifestyle. Many landowners have planted many trees and the area is home to many birds. This is not a space to develop but a space to cherish, protect and share. It is a Blue-green corridor in itself. There is no other easily accessible land in the proximity of town. This is not where to build more houses, it is where to grow food and regenerate biodiversity.

Page 28

Figure 28 - The dominant light green-yellow colour is not defined in the legend

Figure 29 - I live in the light blue zone "*Hall's Totara, Mountain Celery Pine, Broadleaf Forest*" We are gardeners and managed to establish many trees, but no totara nor celery pine has yet survived. Silver beech, mountain beech, olearia, manuka, kanuka and kowhais do well, especially when protected by preexisting (non native) trees.

Page 29

The Wānaka South area is an existing biodiversity corridor home to the following native wildlife: various skinks, pied oystercatcher, kingfisher, spurwing plover, australasian harrier, paradise shelduck, tui, bellbird, fantail, silvereye and a ruru/morepork has been heard last year. Karearea is flying over the valley. It is also home to an abundant exotic birdlife: quails, little owl, yellow hammer, blackbirds, song thrush, chaffinch, goldfinch, sparrow, starling, other finches. Frogs are present. We have a dawn chorus here. But shrinking as new housing development encroaches the land starting by cutting all preexisting trees. Birds need big trees and do not like traffic.

Page 31

I agree with paragraph 1 - "*Due to the high value of land it is crucial that parks and access links contribute to recreation, community and biodiversity outcomes. Multipurpose parks represent the best value for money for the community over the long term.*" It is crucial indeed.

Invasive species "Broom, n.d.; Gorse, n.d.; Wilding Conifers - Otago Regional Council, n.d." is to be discussed. Broom and gorse traditionally offer protection of native plant regeneration then dissolve when the natives shade them. Conifers are not wilding in the Upper Clutha as it is too dry -except close to the water-

I am worried that poplars, willows and "wilding conifers" are not valued as they should be. It has been leading to their destruction - see orchard road massacre. Many are big established tall trees full of carbon, water and birds. I observe every day that native wildlife lives and sings in these tall trees, conifers and other non native trees. Each of these existing trees are extremely valuable as they are what we currently have. I believe it is more useful to write that biodiversity is extended to native and non native trees.

If we let these non native trees be cut, birds have nowhere to live, therefore disappear.

I think it is great to plant lots of natives but I don't think existing trees should be cut to make space for them. The main reason is that trees, native or not, have high intrinsic value, ecosystem value and wellbeing value. I believe, just like humans, we can and we are living in harmony together, in complementarity. Biodiversity value is higher if there are natives and non natives. I understand that wilderness areas deserve to keep or restore their native-only status. I don't believe native-only is good for human settlements areas. Importantly, these established trees exist -thank you- and cannot be replaced. They need to be kept. For example, the plan for Eely Point reserve is a crime and the Blue Green network should step up to protect this important part of the existing (patchy and disappearing) Wānaka green belt. Natives can be planted understory, between the gaps, or on grassland further along.

I will add here that non-native trees were introduced lawfully to New Zealand, they provide valuable services and are often grown in plantations. Wanting trees "here but not here" is madness, segregation. Just like us people, most of us are not native, yet we are an asset to our chosen beloved country. New Zealand is one country in the world where we learn to live together, enriching us all on the way. It requires effort, but it is worth it. So with the people, so with wildlife.

It IS political. It IS reflecting a different world view. For me, trees that grow on their own are a gift from nature and can be used as resources. We could choose to let groups of “wilding pines” grow, then harvest them for timber and firewood, selectively like they do in Europe (no clear cut on the Swiss mountains, is there?). They are not invasive, they are growing instead of nothing, on monoculture of pasture. What are we doing when we cut and poison trees? We remove a free resource and poison the land. It is a shame and I am sorry for the people who do not see that yet.

Trees that grow well and fast in our climate are larches, sequoias, eucalyptus, douglas firs, walnuts, apples, all absorbing huge amounts of carbon, much more than a slow growing native. They are also providing excellent timber, firewood and food. The blue-green plan should include spaces for planting these essential resources for human settlements. How are we going to build and heat houses in a zero carbon economy or in a disaster zone? The wood is no longer going to come from over the ocean, or across highways with broken bridges. It must be grown locally and the blue green plan can include that. Always in diversity (no monoculture). Which landowner has enough space for a couple of rows and allocate a part of that wood to the community ?

It does require a change of culture, but change we must as the crises are squeezing us. A great example of this necessary shift is the lawn. Lawns were made fashionable by rich aristocratic people showing off that they had enough to afford a useless space, at a time when all the land was forest or used for food or resource growing. Lawns swallow a lot of resources: energy, time, poisons, they do not hold water nor carbon; in a climate, biodiversity and “cost of living” crises, they are a squander. Apart from the kids and the dog playing around, large lawns and large pastures are of no use and of no value. The blue green plan can foster this culture shift.

The “invasive” issue is due to a mis-repartition of land. Some people have a land bigger than they can be guardians of. Meanwhile, many people can't afford a quarter acre, which is the size of the land where you can grow some trees and some food. The iconic 1/4 acre New Zealand of the 60's was allowing every household to live. Now, people are pushed into a shoebox out of which they understandably want to escape as soon as they can afford. This creates a runaway economic growth need which erodes wellbeing and is incompatible with the climate, biodiversity and inequality crisis. Yes it IS Political and the blue green plan has the potential to fix all these crises by stepping up and encouraging sharing of the land, creating commons. Council staff in charge of this plan need to go and talk to the landowners. Ask them what would they need to be on board with that? It doesn't need to be money.

Many landowners I know are creating a biodiversity asset on their land (eg. they plant trees or create ponds...) and all they want is a certainty that their land is not chopped up after their death. When we plant trees, it is for us to enjoy when we are alive. It is also for future generations and the birds, and the planet. Carbon sequestration is calculated over many years and at the moment, trees are planted with no guarantee that they will be kept, it is wrong. We need to create a way to protect what IS. A landzoning or any form of protection of private land is an essential part of the blue green part.

I believe many landowners would agree to be part of the green blue corridor just to benefit from that protection.

Maybe another landowner is happy to have a market gardener developing rows of veggies on a corner of his land- maybe in exchange for getting enough veggies for their household. The market gardener could do this on several private properties, creating jobs, local food and adding value to the land.

Maybe another landowner is happy to have foot traffic through their land, with the council taking care of the track maintenance, or toilet, or rubbish bin...

Maybe other landowners want rates rebates in exchange of their contribution to biodiversity or the commons. Or whatever, ask the people.

Likewise, rabbits are not a pest, they are a resource. They are an abundant source of meat (if they were not poisoned) and fur too. In 2013, a local food group identified rabbit as the primary meat resource of the area, yet rabbits are poisoned making it dangerous for consumption. On our land, rabbits are managed, some eaten, every plant and tree is protected, holes are plugged, they are part of the biodiversity on our land.

Again, it is a question of having a land that the owner can manage. If it's too big for them and they can't manage rabbits, then they share it and the blue green corridor is an avenue for that to happen.

Page 31

There is at least one pair of karearea on the Mt Iron reserve. Please add to column 2 paragraph 1.

Page 32

The blue line south of Studholme road is no longer in use, no longer blue. In Melbourne, an old water race has been transformed into a walking trail loop [Bodens Water Race](#). Landowners would need to be approached to discuss if they would like this.

I have added a yellow area showing significant bird habitat and invertebrates. I am not sure of the shape of this zone, I only know from our place and beyond, lots of trees provide a lot of habitat. To be explored.

Page 33. Open space provisions,

Add “ no reserve is existent in the areas opening for development, since these lands are all private. This is the reason why the blue green corridor work must happen. “

Add Studholme Road Sth provides access to a long open space with adjacent rural outlooks, many magnificently planted, with intense dawn chorus. This road is often used by walkers, dog walker, bikers and horse riding, it already is a green part of the network and needs to be protected, and connected. Several private properties in the area are yet undeveloped but at risk to be so the existing rural wildlife and feel is at stake. Several landowners have taken steps to allow some public on their land, this needs to be recorded and preciously fostered.

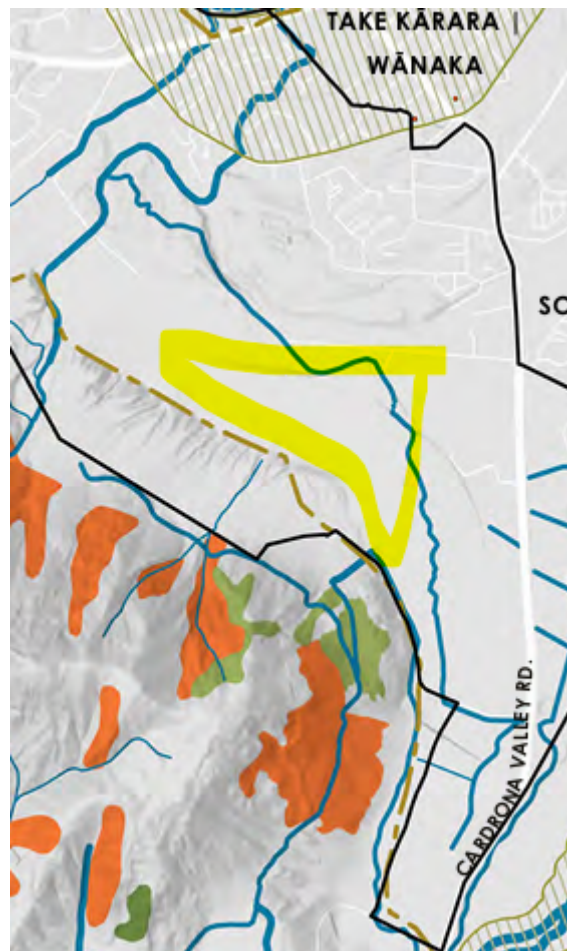
Studholme road north and south are linked by a paper road.

“new subdivisions include a parks and public access trails/connections that do not have enough land area to deliver... “

Page 36

Please also record non indigenous vegetation. As mentioned above, every tree is essential for the biodiversity and carbon crises therefore as valuable as indigenous. A mix is richer than indigenous, just like people.

“ Removal of invasive vegetation: Removing invasive weeds helps to restore the natural ecosystem and prevent the spread of invasive species that can outcompete indigenous flora” remove, this is not true. We grow native within non natives very happily, better in fact. Birds native or not prefer big trees, native or not. I invite you to our place to witness it. It is not political, it is the reality. Removal of “weeds” is political and must stop, every plant, every tree is valuable. Removing often incurs chemicals which create pollution, so beyond planetary boundaries. We, as a society, must rise above the separation and killing and learn to live in harmony. Between humans, for all plants, all living beings. If the blue green plan results in killing existing beautiful varied species of tree specimens, then I think it is a total shame.



What makes Wānaka autumn special? The colours of the willows and the poplars. Simple. Please do not remove them. I love natives and we can achieve colour with them but not Beautiful spring flowering and autumn splendid leaves shows. It is absurd to exclude non-indigenous vegetation from the plan.

Glad to see the word “commuting” finally! Should be used in the intro, as essential for low carbon living.

Page 47

We see clearly on this map that generous green spaces were planned in the early days of Wānaka development but nothing beyond the medical centre. The protection of trees and green space on private land must be enforced or it will all be covered in concrete over time.

“Three Parks is an emerging greenfield development. Although some open spaces are provided and a substantial future sport and recreation hub is planned at Ballantyne Road, there are poor connections and new local and community parks will need to supplement outer residential areas and no civic space is provided within Three Parks Town Centre.” The consent to this project is recent and it is appalling that it was granted. The Council rules must change so that it doesn’t happen from now on. The bike lane along Sr Tim Wallis is dangerous. A generous separate bike lane needs to be added for everyone's safety. The intersection with Ballantyne Road needs immediate attention. Three Parks should have three parks and it’s not too late, as it is not fully built yet.. I heard in the news that a community market place is planned, great act of generosity, more generosity is possible, how many millions does one person need?

12.04 This area has been butchered, hundreds of mature -historic- trees with singing birds gone. It’s essential to recreate parks -but unfortunately will take decades. This zone is being developed now, what are the consents planning for this area? So far I can see boundary to boundary houses with of course no room for trees.

Page 50

What are the arrows along Orchard road and Studholme road meaning?

I like the proposed trail at the bottom of Mt Alpha, looking forward to enjoying this.

16.01 “New parks” awesome, need to be connected, how would that be achieved.

Cardrona road is marked as a trail. It’s not a trail but a fast road, very dangerous to bike and unpleasant to walk.

10.01-16-02 Lots of existing ecology. Detailed survey needed to not lose it. Talk with landowners of the area.

Page 55

“Resource allocation” Please note that protection is free. Nothing needs to happen, be paid for. Leaving nature as it is is free. So protecting what we have is the most resource friendly step and should always come first.

“Environmental impact” same comment: doing nothing helps nature. Should come first.

“Regulatory Compliance” this is debatable. The current Regulatory Compliance creates absence of green blue areas and authorises destruction of existing natural assets. I believe a change of regulation is necessary to achieve the blue green goal, so provision for this change must be stated here.

“Economic Opportunities: *“sustainable economic growth”* is an adynaton. Anyone who studied sustainability knows that growth has a direct adverse effect on the planet. Actually degrowth is necessary for society to operate within the planetary boundaries.

Yes having nice trails is an asset for tourism and locals alike, but so far, the use of “our” trails by tourists and tourism operators have damaged our experience. I don’t believe we do the blue green plan for economic opportunities, it needs to come from a generous, responsible climate-planet friendly place, not from the appeal of gain.

Replace with “Economic sense”: Every piece of nature we keep is providing essential ecosystem services, resilience opportunities and zero carbon living, protecting us now and the future. It is responsible and sensible in a world faced with multiple climate, biodiversity and inequality crises.

“Stakeholder Engagement”: a 112 page document is not conducive to community engagement, it contains a lot of repetition, jargon; Who has time to read and comment on it? A 10-pages document should suffice with links of course to specific maps. For engagement, the best move is to come and talk with us, how we live, where we live, our trees, our birds, to see what we are trying to protect and helping us achieve it. Remember, protection is the cheapest.

Page 56:

0.01 I like “*greater statutory weight.*”

0.09 “*QLDC Reserve Management Plans to Integrate BGN Plan values and principles*”, that is keep all nature we have, trees and all, so stopping all moves to cull the valuable douglas firs on Eely point and willows and poplars everywhere, they ARE the assets.

0.11 “*Through subdivision consents, ensure developers or landowners are delivering*” wonderful, yes, way to go. It starts by not cutting the existing trees. Tree lines along the roads of subdivision projects must be kept for the privacy of future residents and wellbeing of passerby who do not need to see all the land bulldozed and construction work for ages, really bad for wellbeing. So many people feel absolutely gutted by the devastation along plantation road, you have no idea! Furthermore, these trees are not replaced by a few young sticks taking decades to grow. Old trees, most are not natives because that’s what historical choices leave us with, are all precious and must be protected. A simple rule change is necessary to achieve that, simply extending the **existing tree protection on public land to all trees**. No line of tree should be clear cut (or where do the birds go?)

Further pages

I have read those diagonally, because I have a life! They look good to me, well done.

Page 64

“Reserve land contribution” must be in land, not in money.

Page 66

“*Exotic vegetation poses a significant threat to native biodiversity by out competing native species for resources, altering ecosystems, and reducing habitat suitability for indigenous flora and fauna. Its aggressive growth can lead to the displacement of native plants and disrupt ecological balances, ultimately diminishing the resilience and health of natural habitats.*” This is not true. Total brainwash. It may be true in conservation land, DOC land, but it is not true in human settlements.

Page 87

“*Three Parks has adequate local and community park provision*” contradicts what declared on page 47. I object to the statement “*south of Wānaka are undeveloped grasslands, and have little ecological value.*” This area is not undeveloped. It is developed as the people who bought the land intended it. Ample lifestyle blocks for nature protection and regeneration. They have great ecological value! Please come and have a look

at our place, we have more skinks and birds than anywhere in the district, no survey was ever done despite asking several times for it. This is false and must be removed from the report until a survey says the truth. The table "Park Provision" shows that parks meet requirements. That must be wrong. There are no parks in the private lands and subdivisions further to the old town, as stated correctly page 33.

Page 91

If I understand the table, there is a need for 3 hectares of park when adding 3,750 to 8900 houses. This must be a mistake. The whole green blue plan is aiming at too little green space. Remember, the UICN recommend 30% if we are to survive as a civilization. Where do we grow food in 3 hectares also used as trails and recreation? As said from the start, the plan must be more bold.

The maps on the next page show that the whole area is a gap, there is no walkability to any park and no connectivity, showing that much more than 3 hectares must be created as reserves. Actually, there is quite a lot of connectivity both for pedestrians and birds, come and talk to us, we can show you.

Regulatory change proposal

I see nothing in this plan that can effectively foster blue green corridors as there is a missing piece of legislation: no land can be protected at the moment, unless it is purchased by the council, which is very costly, and can be reversed or the land used for something else. Yet, there are many existing green spaces on private land. Just not shareable and not protected in the current legal framework.

A new land zoning allowing landowners to share their land with biodiversity and/or the community with the condition of perpetual protection would create commons, thereby creating the blue green network. Many landowners would want to participate as no one plants trees to see them chopped up by the next owner for subdivision. 50 years of protection? 100 years? To be discussed. Perpetual is best, how else to keep what has been achieved by years of nature regeneration? We can't create it, we can't buy it. A deep soil takes years, trees take decades, we need long term protection. The land could still be sold but with the same condition of protection. It is so easy and it would work so well. Immediately, dozens of landowners would put their hand up and huge lands would become available for trails, food growing, tree planting and nature regeneration.

I have talked about it at the "*Upper Clutha Participatory Design Workshop*" and I am offering to talk to you further about this, as we have put a lot of research and thinking into it. It would literally deliver all the climate, resilience, food and affordability, low carbon living needs we have been talking about for years. In the meeting, I was told I have been "heard loud and clear" and yet, the idea doesn't even arise in the report!

The Regenerative Land zoning idea has been presented and shared to many council staff and elected members since 2023. But no one has listened. Why? Because they prefer growth! It is not contrary to growth. It is putting people and the planet first.

The elections have just shown that the growth mindset of the previous mayor has been rejected, for a more community friendly approach. It needs vision, guts, and I hope people working on this plan can find the strength and the way to effectively create this essential regulatory change: a simple voluntary land zoning to create a lush beautiful vast blue green network in our communities. Call it blue green land zoning. And this would be a real change with real biodiversity/climate/community benefits. This would achieve the blue green plan purpose in a few years, a very little cost. I am yet to see a better idea to foster the necessary change, change that this report is trying to achieve. I hope this is a good time for you to hear and act on it.

Another way are Land Trusts. They are a private way to achieve the vision for a blue green network. QEII trust is not interested in smaller blocks so cannot help. I believe it is the role of the Council to facilitate a land use that both protects and produces the described purpose. Iwis know a lot about Land trust, so maybe it is a way to explore, therefore should be included in the report.

Page 56 0.11, the draft plan offers a partial slow solution to achieve the desired outcomes, delivered as conditions for resource consents as the land progressively gets developed, it is better than nothing.

We are in a crucial pivotal time that requires courage and new ideas. We would not need to change radically if the existing systems were creating a sustainable world. But they aren't, crises and squeezes are worsening. So we need a paradigm shift and not fear because all the solutions exist. It's exciting.

To thank you for reading, here is a South Wanaka walk in the park exotic/native combined beauty. I invite you to visit us on Studholme Road and offer to help create this change, for the greater good.



Layout comments:

- 1- This document is nearly impossible to navigate on a phone as there are columns, phone layout needs to be vertical one column- for next time please.
- 2- The dark background of the page makes the comment function nearly illegible. Next time, please use white background so we can comment directly in the doc.
- 3- There are lots of repetitions in this 112 page document, quite repellent for people to have a look. This is also why there are repetitions in my submission!
- 4- The pages of the document do not correspond to the pdf page count, so it is confusing. I used the page number shown at the bottom of each page.
- 5- I suggest the council looks into participatory democracy models for the best use of the tools that exist. Ex. [Loomio - make decisions together](#) or other [Participatory Democracy Resources](#)

WAI Wānaka

Submission to Queenstown Lakes District Council on the Draft Blue Green Network Plan

Date: 23/12/2025

Contact: Prue Kane, prue@waiwanaka.nz

1. Introduction

WAI Wānaka welcomes the opportunity to comment on the Draft Queenstown Lakes Blue Green Network Plan. WAI Wānaka acknowledges the significant work undertaken by Council to develop an integrated, values-based approach informed by community and mana whenua. This plan has strong potential to guide growth in a way that protects and enhances te taiao, particularly in the Upper Clutha.

As a key delivery partner in environmental action across the Upper Clutha catchment, WAI Wānaka is encouraged by the plan's principles and purpose, especially mana o te wai, Ki Uta Ki Tai, and connecting people and place. This approach is consistent with WAI Wānaka's strategic objectives and activities, including catchment-wide restoration, urban stormwater education, and community-led action programmes such as Adopt a Drain, school education, and urban action groups.

WAI Wānaka supports the overall direction of the plan and the effort to connect and integrate with other plans and activities, while offering constructive feedback to strengthen its utility, ambition and effectiveness, particularly for the Upper Clutha.

2. General support and alignment

WAI Wānaka supports:

- The plan's intended future focus on areas yet to be developed, ensuring that blue-green considerations are embedded before urban form is locked in.
- The plan's recognition of benefits for natural and built environments, community wellbeing, and tourism, and its intention to integrate treatment of blue, green and community networks.
- The incorporation of Kāi Tahu aspirations, including mana o te wai, mahinga kai and Ki Uta Ki Tai, and the companion Kāi Tahu Blue Green Network – Ki Uta Ki Tai report.

- Identification of awareness-raising and education as key potential benefits, which aligns strongly with WAI Wānaka’s mahi in urban catchments and community-led behaviour change.^[5]

3. Areas for improvement

3A. Understanding and maximising what we have

The mapping of existing assets does not recognise all the less formal blue-green corridors and local linkages that already exist in Wānaka and surrounding Upper Clutha settlements. These include informal paths, drainage corridors and small waterways that provide everyday connectivity between homes, schools, parks and town centres.

These informal corridors are important because they:

- Support neighbourhood-scale liveability and active travel, aligning with the plan’s outcomes around accessibility and well-designed neighbourhoods.
- Offer practical opportunities for enhancement to deliver ecological protection and restoration, as well as water sensitive urban design (WSUD) features that improve resilience and community wellbeing.

WAI Wānaka recommends that Council:

- Ground-truth and map informal blue-green corridors in Wānaka, Albert Town, Lake Hāwea and Luggate, and list them as “candidate network elements” in the BGN.
- Use these corridors to prioritise upgrades (e.g. path surfacing, planting, WSUD retrofits) in the 10-Year Plan, particularly in rapidly growing areas such as Wānaka West, Wānaka South and Hāwea.

3B. ‘Blue’ under-represented relative to ‘green’

While the document is titled a Blue Green Network Plan, the balance between these themes becomes uneven as the plan unfolds. The early sections strongly emphasise “making space for water” and catchment-scale thinking, but this diminishes in the local opportunity maps, where “blue” is often limited to main lakes and rivers.

In the Upper Clutha local plans for Wānaka, Albert Town, Lake Hāwea, Luggate, Cardrona and Makarora, overland flow paths, smaller tributaries and gullies are not clearly identified as opportunities, despite their role in flood management, water quality and ecological connectivity.

Green infrastructure is noted conceptually as a key feature of the BGN, yet it does not appear as a mapped network layer in the opportunity plans.

WAI Wānaka considers this a missed opportunity to:

- Build interconnection and climate resilience by explicitly mapping “space for water” at settlement scale, including overland flow paths and potential flood storage areas.
- Connect freshwater and stormwater more explicitly to community awareness and behaviour, by recognising stormwater as both a risk and a resource that can support blue-green assets.

WAI Wānaka recommends that Council:

- Add “space for water” as a distinct category in local opportunity maps, including tributaries, gullies and overland flow paths, especially in Wānaka West/South, Albert Town and Hāwea.
- Treat WSUD and stormwater features (e.g. raingardens, swales, detention basins, wetlands) as a mapped blue-green network layer alongside parks, trails and ecological corridors.

3C. Integration with other plans and frameworks

1. QLDC infrastructure planning and stormwater catchment management

The current blue networks in the BGN appear largely accounted for on an in-situ basis (lakes, main rivers, some wetlands), but the wider stormwater catchments and overland flow paths are not obviously considered. This limits the plan’s value as a tool for prioritising WSUD and green infrastructure.

WAI Wānaka recommends:

- Integrating stormwater catchment management plans and infrastructure planning into the BGN mapping, so that key flow paths and ponding areas are visible and aligned with green infrastructure opportunities.
- Using this integrated mapping to identify priority locations for WSUD and nature-based stormwater solutions in Upper Clutha growth areas.

2. Planning for growth and the QLDC 10-Year Plan

The BGN outlines possible locations for future parks, but does not explicitly identify “space for water” in those same areas or describe how stormwater can be treated as a resource that supports green assets and ecological enhancement.

To make the plan more actionable and to inform funding decisions in the 10-Year Plan, WAI Wānaka suggests:

- Requiring that structure plans for major greenfield areas (e.g. Wānaka South, Hāwea South) include an integrated network of parks, ecological corridors and WSUD features, designed at catchment scale.
- Linking these requirements to development contributions and reserve land decisions, recognising stormwater treatment and flood storage as part of the blue-green network.

3. **QLDC Climate and Biodiversity Plan 2025–2030**

The draft BGN references the 2022–2025 Climate and Biodiversity Plan but not the updated 2025–2030 plan, which further emphasises nature-based solutions, urban greening and climate adaptation. These plans are mutually reinforcing and could work together to ensure that urban environments in Queenstown Lakes are designed to be resilient and biodiverse.

WAI Wānaka recommends:

- Updating references to the current Climate and Biodiversity Plan and explicitly aligning BGN implementation with climate-related actions (e.g. urban WSUD, heat mitigation, native restoration in flood-prone areas).
- Using the BGN as one of the primary delivery mechanisms for the climate plan’s urban and catchment-scale actions in Upper Clutha.

4. **ORC’s Upper Lakes Catchment Action Plan**

Otago Regional Council’s recently adopted Upper Lakes Catchment Action Plan identifies stormwater and wastewater discharges as having a “high” pressure rating on freshwater and prioritises reducing contaminants from these sources (Strategy 11). This is particularly relevant in the Upper Clutha, where stormwater outfalls discharge directly to Lakes Wānaka and Hāwea and key rivers.

WAI Wānaka recommends:

- Explicitly referencing the Upper Lakes Catchment Action Plan in the BGN and aligning blue-green priorities with ORC’s stormwater objectives.
- Using the BGN to identify demonstration sites for integrated stormwater treatment and education at key lakefront and river outfalls in Wānaka and Hāwea.

To achieve effective integration across these plans, WAI Wānaka supports the establishment of a regular forum where QLDC teams can meet with ORC and relevant community groups to share information, align objectives and identify efficient routes to shared outcomes.

3D. Ambition for future development and retrofit.

The BGN focuses primarily on future growth areas, which WAI Wānaka supports, but there is also an opportunity to set clearer expectations for both new developments and retrofit opportunities, particularly on the “blue” side of the network.

A tangible example is the potential to add wetlands and WSUD features around lakefront stormwater outfalls in Wānaka and Hāwea. If designed well, these could:

- Improve water quality and reduce contaminant loads entering lakes and rivers.
- Enhance biodiversity and habitat connectivity along foreshore and river margins.
- Strengthen the mauri of the wai and whenua, and support Kāi Tahu values and mahinga kai.
- Foster stewardship, education and community engagement by acting as visible, accessible “learning sites” for urban catchments.

For future developments, the plan is an opportunity to set ambitious targets for WSUD implementation that:

- Reduce pollutants entering freshwater and manage flood risk.
- Treat stormwater as an asset that sustains blue-green infrastructure.
- Increase community resilience during climate events and, in turn, wellbeing.

WAI Wānaka recommends that the plan:

- Include explicit WSUD performance expectations for new greenfield areas (e.g. proportion of impervious area draining to treatment systems; minimum extent of planted riparian buffers).
- Identify priority retrofit locations (e.g. key lakefront outfalls, Bullock Creek, Cardrona and Hāwea tributaries) where blue-green upgrades can be delivered over time.

3E. Partnering with community for co-design, implementation and management.

WAI Wānaka has been working with the urban community for the last five years to build awareness of our collective impact on freshwater. Through programmes such as Adopt a Drain, schools education, beach clean-ups and urban action groups, there is now a growing cohort of residents ready and willing to participate in the implementation and management of solutions in their “catchments”.

The BGN provides an opportunity to:

- Identify specific sites where co-design, co-funding and co-management between council and community can be trialled (e.g. stormwater wetlands, enhanced roadside swales, community planting corridors).

- Showcase community-led integrated stormwater management as a core expression of the BGN's principles, not an optional addition.

WAI Wānaka recommends:

- Mapping at least a small number of “community partnership opportunity sites” in the Upper Clutha local plans and inviting community groups to work with council on their design and phasing.
- Including mechanisms in the plan (and subsequent implementation documents) for community co-governance / stewardship of specific BGN projects where appropriate.

3F. Connecting the Blue Green Network with ecosystem services logic.

The BGN is well positioned to be a flagship for ecosystem services-based planning in Queenstown Lakes, but the current draft does not fully harness this potential. Ecosystem services logic is a valuable planning and communication tool for highlighting how BGN interventions contribute to:

- Resilience to climate, environmental and land-use change (e.g. flood attenuation, heat mitigation, erosion control).
- Amenity, recreation and cultural value, including Kāi Tahu values and sense of place.
- Economic value, including property value uplift and tourism benefits, as noted in the BGN's discussion of economic opportunities.

WAI Wānaka recommends:

- Explicitly linking BGN projects to ecosystem services in the plan's framework and in the description of local opportunities.
- Developing a simple ecosystem services “scorecard” for key BGN projects, to inform prioritisation and to communicate benefits to residents and decision-makers (e.g. flood mitigation, biodiversity, recreation, cultural value, property value).

4. Recommendations

In summary, WAI Wānaka recommends that QLDC:

1. Map overland flows and space for water

Include stormwater catchments and overland flow paths in the BGN maps, particularly in Upper Clutha settlements, to identify and plan for green infrastructure and WSUD along these flow paths.

2. Recognise and build on informal blue-green assets

Ground-truth and incorporate informal corridors and local linkages in Wānaka, Albert Town, Hāwea, Luggate and Cardrona, and use them to strengthen outcomes around environmental resilience, community wellbeing and identity of place.

3. Partner with community for co-design and implementation

Identify specific sites with potential for co-design, co-funding and co-management between council and community groups, to showcase community-led integrated stormwater and blue-green solutions.

4. Integrate WSUD and green infrastructure as a deliberate network layer

Treat WSUD and green infrastructure as a mapped and planned component of the green network, both current and proposed, with clear expectations for greenfield areas and priority retrofit sites.

5. Utilise and embed ecosystem services logic

Connect the BGN explicitly with ecosystem services logic to maximise the positive outcomes of projects, support prioritisation and communicate benefits to residents and decision-makers.

6. Establish a regular blue-green forum

Convene a regular forum connecting relevant QLDC departments, ORC and community groups (including WAI Wānaka) to share knowledge, align objectives and enable community participation—financially and practically—in implementing BGN solutions across the Upper Clutha.

5. Conclusion

WAI Wānaka supports the intent and direction of the Blue Green Network Plan and its emphasis on mana o te wai, integrated networks and well-designed neighbourhoods. WAI Wānaka sees significant opportunity to strengthen the plan’s treatment of “blue” systems, WSUD, ecosystem services, and community partnership, especially in the Upper Clutha where growth pressures and freshwater values are both high.

WAI Wānaka looks forward to continuing a strong partnership with Council to refine the plan and work collaboratively to deliver shared outcomes for our lakes, rivers, whenua and communities. WAI Wānaka would welcome the opportunity to discuss this feedback further with QLDC.

Ngā mihi nui,

Prue Kane

Urban Lead

WAI Wānaka

www.waiwanaka.nz

SUBMISSION



TELEPHONE 0800 327 646 | WEBSITE WWW.FEDFARM.ORG.NZ

To: **Queenstown Lakes District Council**

On the: **Draft Blue-Green Network Plan 2025**

By: **Federated Farmers of New Zealand**

Date: **12 December 2025**

Submitter: Otago Federated Farmers of New Zealand

LUKE KANE

OTAGO PROVINCIAL PRESIDENT

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GENERAL SUBMISSION

This submission is presented on behalf of the Otago Federated Farmers members operating within the Queenstown Lakes District Council (QLDC) area, encompassing extensive high-country stations and intensive pastoral/horticultural enterprises within the Wakatipu and Upper Clutha basins.

The farming sector offers conditional support for the high-level aspirational principles of the draft Blue-Green Network Plan (BGNP), particularly the commitment to enhancing biodiversity, protecting native habitats, and improving water quality within the urban spaces. The sector also recognises the value of strategic planning to protect and integrate parks, open spaces, trails and waterways into the district as it grows.

However, this support is dependent on the satisfactory resolution of our concerns with the BGNP, as described below:

Role of the BGNP with statutory council planning requirements

The status and alignment of the BGNP with statutory planning documents and processes, requires clarification.

A concern for Otago farmers is the potential for the BGNP to create potential regulatory uncertainty, overlap, and inefficiency with the established regional planning responsibilities of the Otago Regional Council (ORC). The ORC manages water quantity, water quality, and discharges through objectives, policies and rules in its Regional Plan.

The national response to improving freshwater quality has been the introduction of Freshwater Farm Plans (FFPs). It is proposed that FFPs will continue under the Natural Environment Bill. It is crucial that the BGNP does not conflict with requirements for the FFP's process.

QLDC must avoid imposing its own set of requirements for managing the "blue" network, if it could create a dual compliance burden on the farming sector. Farmers are already subject to ORC compliance administration fees, monitoring fees, and non-compliance charges related to freshwater management.

We seek that QLDC ensure any monitoring or compliance activities related to water health or riparian management remain solely with the ORC, and that the BGNP provide clarification of this matter.

We also seek assurance that the BGNP will not result in any proposals for new, prescriptive land-use controls in the Rural General Zone, through the District Plan.

Risk of future regulatory burden and costs on private landowners

The BGNP sets a strategic, long-term framework aimed at environmental improvement, particularly enhancing water quality and supporting *Te Mana o te Wai*. Although the plan focuses on urban areas, farmers are concerned that these environmental outcomes, coupled with the aim to inform future development and statutory planning, will inevitably lead to new mandatory rules imposed on their rural land, demanding costly infrastructure like fencing and riparian planting to protect adjacent waterways or ecological corridors.

The BGNP seeks to enhance biodiversity and ecological corridors. However, the landscape surrounding settlements is significantly impacted by invasive species such as wilding conifers and woody weeds. Farmers are concerned that the operational and financial burden of conducting necessary landscape-scale pest and weed control—essential to achieve the BGNP's environmental objectives—will fall primarily upon private landowners without adequate financial support or co-investment.

The benefits identified in the BGNP - enhancing biodiversity, improving water quality, and building climate resilience - are unequivocally public goods. The costs associated with generating these public goods on private, productive land must be borne by the community (via QLDC funding), not unfairly externalised onto the individual landowner.

Increased pressure for public access and associated risks

A core aim of the BGNP is "connecting people and place" and increasing access through trails and tracks along the coastal marine area, lakes, and rivers. Farmers anticipate conflicts arising from increased pressure for public access across their working land, leading to issues such as trespass, biosecurity risks, and interference with livestock, particularly where the plan seeks to fill "gaps" in the existing trail network along waterways. Increasing trails and tracks on private land comes at a substantial cost for landowners, eg fencing off productive land. The funding available for landowners from QLDC may not cover all the cost.

Land acquisition

The BGNP is silent on the degree that private landowners will be affected, and the process for acquiring any private land necessary to fulfil the QLDC's vision. It would be useful if the BGNP acknowledged this matter.

Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents many farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers. The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment.
- Our members' families and their staff have access to services essential to the needs of the rural community.
- Our members adopt responsible management and environmental practices.

This feedback represents the views of our members and reflects the fact that resource management and governance decisions have a daily impact on our member's lives, both as farmers and members of their local communities.

Feedback on the Draft Blue Green Network Plan

Submitted to: Queenstown Lakes District Council

Submitted by: Luggate Community Association

Date: 26 October 2025

Introduction

The Draft Blue Green Network Plan outlines a comprehensive plan for our area.

The Luggate Community Association endorses the document as it relates to Luggate and its environs.

The Luggate Community Mission statement was developed by community members during the “Shaping Our Future” workshops in 2023. Luggate will be *“a vibrant, safe and connected community that is well planned and with future proofed infrastructure”* and this continues to be our focus.

The following areas have been identified by community members to be considered for inclusion.

Many will broadly fit into the five gaps identified and a number of areas are being worked towards through community association initiatives.

One area that is not mentioned, and which we felt required highlighting are the historical features in the immediate Luggate settlement as well as adjacent areas.

The following areas are in no particular order.

1. Biodiversity

Wilding Pines continue to spread. Large trees behind the housing in the centre of town have been identified as being of concern.

Non indigenous vegetation along Luggate Creek is impeding fish migration. In recent winds numerous large branches fell.

The Luggate Creek Restoration project up the creek near its source has begun. Criffle Station, Lake McKay Station and DOC have developed this plan. Contact person for the Project is Dr Mandy Bell, Criffle Station.

2. Community Resilience

Need for ongoing strategies to improve community resilience and independence in the event of a widespread unexpected emergency.

3. Heritage

The plan should reflect the Heritage value of Luggate and the wider Upper Clutha environment and include buildings such as the Luggate Mill, the Hotel and historic Red Bridge. There are also numerous residual examples of gold mining activities including dredge remains; tailings and water races. Many identified sites are in reports completed by Matthew Sole, Kopuwai Consulting.

4. Reserves

Community feedback was sought earlier this year in respect to play equipment in the Hopkins Street Play area. It was identified that there is a lack of opportunities for older children in the area. Report available from Luggate Community Assn.

Proposed draft plans for Lake McKay reserve will meet some of those needs.

5. Rooding (Safety and Connectivity)

Luggate is a growing community, which is dissected by the main Wanaka-Cromwell Road.

This presents concerns for community links and safety. Paths and tracks to assist walkers and cyclists' movements away from busy roads with limited shoulders, is required for safety. A walking and cycling track along Church Road to enable connection to and from the township to the main river tracks beside the Clutha is required.

Concerns regarding safe speed limits through town requires review.

Signage review for visitor's access to river tracks for fishing and swimming as well as parking areas to accommodate the anticipated increase in use.

6. Walking and Cycling Tracks

We have been in discussion with the Upper Clutha Tracks Trust regarding the need for a safe urban cycle route into Wanaka.

7. Waterways

Further to the future riparian planting along Luggate Creek identified in the plan, a longer-term plan to remove the non-indigenous willow growth along the Luggate Creek is required.

This regularly presents safety concerns to track users and impedes fish migration up Luggate Creek.

Don't hesitate to contact me if you need any further information. We look forward to contributing further in the future.

Regards

Judy Thompson
Chairperson
Luggate Community Association



Protect Our Winters Aotearoa – Submission on the QLDC Blue-Green Network Plan

As a community of outdoors people, we are athletes, snow sport industry workers, and nature appreciators. Protect Our Winters Aotearoa (POW) is deeply invested in the future of our environment. The outdoors shapes our identities, our livelihoods, and our wellbeing. We have seen firsthand climate impacts already reshaping the alpine environments we love, with warmer winters, lower snowpacks, and unpredictable weather. POW currently has more than 250 members, the majority residing in the Queenstown Lakes District. We see the Blue-Green Network Plan as a crucial opportunity to strengthen climate resilience and protect the snowy landscapes we cherish.

We want to acknowledge the extensive research that has gone into developing the QLDC Blue-Green Network Plan. We appreciate the plan's progressive direction and its efforts to strengthen environmental protection. POW supports the Blue-Green Network Plan and recognises its potential for significant long-term benefits for both our environment and communities. While we acknowledge many positive components of the plan, we believe that several aspects require refinement to ensure the plan is fully effective and inclusive.

We are pleased to see consultation with Kāi Tahu, Ngāi Tahu, and consideration of Te Ao Māori to date. However, the plan makes no mention of partnering with Māori or engaging Mana Whenua in future design and implementation. For the plan to be truly environmentally conscious, QLDC must commit to ongoing collaboration with Mana Whenua, uphold Te Mana o te Wai, and ensure Māori representation in the restoration and protection of riparian margins, wetlands, and waterways. There needs to be written commitments to Māori engagement and representation at every stage of decision-making – within either future or retrospective

developments. Honouring Te Mana o Te Wai is crucial for protecting natural environments for generations to come, and something POW is committed to too.

Ecological corridors must also be required in all major developments rather than treated as 'aspirational'. Retrofitting green spaces is costly, damaging, and counterproductive for all stakeholders. The Three Parks development in Wānaka, which lacks adequate greenery and community space, demonstrates the consequences of treating green infrastructure as an afterthought. Without ecological corridors, communities face erosion, trail damage, exposed landscapes, and greater climate vulnerability. Similar patterns are becoming more common across rapidly developing suburbs, where urban sprawl infrastructure has trumped the inclusion of parks, shade, and ecological connectivity. When ecological corridors are treated as optional, the outdoor community feels the consequences. We need to drive more to access outdoor recreation, we see more erosion, more trail damage, more exposed landscapes, and more climate vulnerability.

In Wānaka, the Three Parks, South, and West areas are at risk of becoming highly urban with little green space. QLDC must act quickly to secure public green space, commuter and recreational trails, and water protection. Developers should be held accountable for contributing to trails and parks rather than leaving QLDC to retrofit infrastructure. In the Tāhuna area, we welcome the inclusion of key areas of the Eastern and Southern Corridor, but more native bush, recreational trails, and commuter trails are urgently needed so residents can access outdoor recreation without driving.

In Wānaka, the Three Parks, South, and West areas are at risk of becoming highly urban with little green space. We note that these areas have been marked as key priority areas – which they should be. QLDC must act quickly to secure public green space, commuter and recreational trails, and water protection. Developers should be held accountable for contributing to trails and parks rather than leaving QLDC to retrofit infrastructure. In the Tāhuna area, we welcome the inclusion of key areas of the Eastern and Southern Corridor, but more native bush, recreational trails, and commuter trails are urgently needed so residents can access outdoor recreation without driving.

The Three Parks area has been under construction for many years now and yet there is still no native bush, no dedicated public green spaces, parks, playgrounds, land set aside for public bus stops, bus stations, or future cycle trails. There are lots of new car parks visible and nothing else. This is a perfect opportunity for bike and pedestrian trails to shortcut between streets and large shopping complexes, it shouldn't be that in the future to bike between two places in Three Parks that you have to bike out through a car park, along the main road, and then back into another carpark. See below for an example.

We also recommend that satellite communities such as Luggate and Cardrona not be developed with further housing. Urban sprawl stretches resources, increases traffic, and reduces space for nature. QLDC should focus on higher-density development in fewer areas, leaving more room for natural landscapes.

We appreciate that the plan acknowledges gaps in existing areas, particularly the lack of adequate parks and trails. However, there is minimal information on how these gaps will be addressed. With future population growth, it is essential that more parks and waterways are within walking distance of residents. POW supports plans to plant indigenous vegetation, restore riparian corridors, and connect existing vegetation, as well as future trail development. We urge QLDC to expand these efforts with more planting, more waterways protected, and more trails so that everyone is within walking distance of a trail. International examples such as Whistler in British Columbia and Breckenridge in Colorado demonstrate successful models that QLDC could learn from.

Accountability and monitoring are also crucial. QLDC should commit to annual public reporting on progress, including updates on ecological corridor delivery, planting targets, and infrastructure developments. Scheduled plan reviews every three to five years will ensure adaptation to new climate science and community transparency.

We appreciate that climate change has been considered in the planning. Rising temperatures and more hot days will require shade, water conservation, and drainage. Consultation with ecologists is recommended to ensure native species are resilient to, and can help mitigate temperature rise, fire, and flood risk.

With these changes outlined, Protect Our Winters Aotearoa supports the direction of the Blue-Green Network Plan. We view its implementation as a chance to build a climate-resilient, future-focused Queenstown Lakes District that could inspire other regions to follow.

Thank you for letting us share our thoughts on this extremely important plan.

We all need winter, and winter needs us.

Ngā mihi nui

Protect Our Winters Aotearoa



Three Parks example. No green space, and no cycling/walking shortcuts. Eg. Currently you can't bike from Snap Fitness, to the Salvation Army store, to the pool. You have to bike back out to the road and then in again. See in the diagram where the yellow current gravel bike trail exists (and need to continue to exist) and the orange lines could be easy bike or walking shortcut trails.

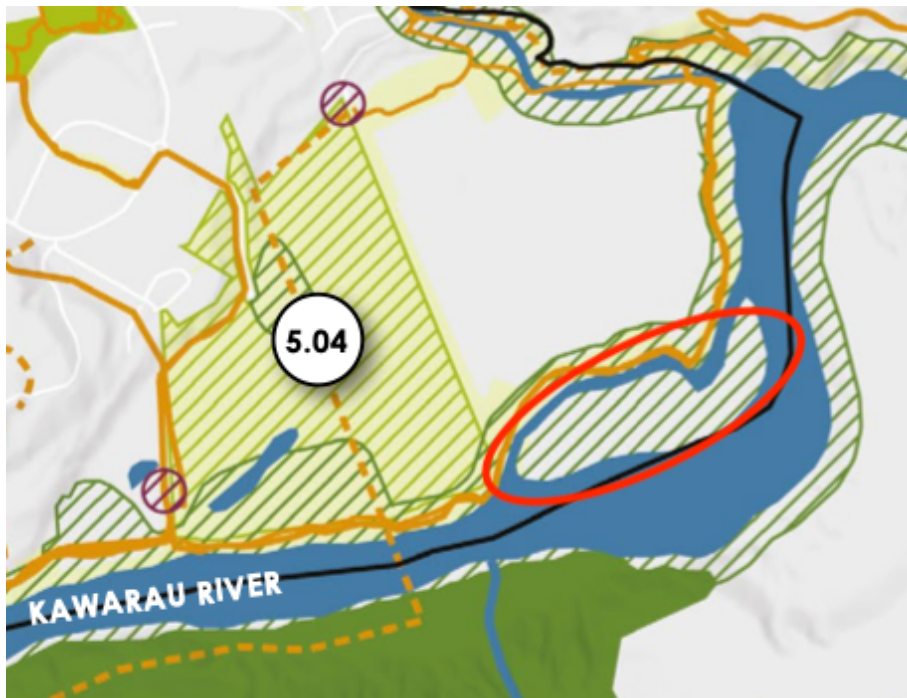
Blue Green Network Plan

Thank you for the opportunity to make a submission on the draft Blue Green Network Plan (BGNP).

This submission is made by both Remarkables Park Limited (the owner and developer of land in the RPZ at Remarkables Park) and Queenstown Park Limited (the owner and operator of Queenstown Park Station, a 2,000 ha high country station on the north face of The Remarkables, with a 10km boundary along the true right bank of the Kawarau River) together referred to as "RPL". RPL's particular interest is in the Local Blue Green Plans #4 and #5 – Te Kirikiri Frankton and Te Putahi Eastern Corridor.

1. Proposed Ecological Area in the Kawarau River below Bridesdale

The BGNP shows an apparent "island" in the Kawarau River below Bridesdale as "Ecology – Proposed". The area is circled red on the excerpt from BG Plan 5 below. The BGNP does not describe what ecological planting might be proposed at this site. RPL's submission is that the greatest care needs to be taken before undertaking any planting of trees or woody species in this area. In the interests of reducing the impacts of flooding on the wider Queenstown community, RPL further submits that it would be preferable to take active steps to encourage the ecology to revert to its near original state.



Excerpt from BG plan 5

The black and white photo below is dated 1983. It illustrates that this part of the riverbed was almost completely devoid of trees as recently as 50 years ago. The few trees that were then establishing in the river were likely willows and were likely washed down from willow plantings further upstream. It is most unlikely that trees of any sort were part of the natural state of the riverbed in this location. The photo also illustrates the wide path that the river would have been able to take in flood conditions.

The 1983 photo should be compared with the much more recent, coloured photo below it. It is evident that the (likely) self-sown trees have now infested this area of riverbed. They have significantly reduced the path of the river and it is likely that this narrowing of the river has already contributed to unnecessary flooding both locally and upstream.



1983



2025

At the time of writing this submission, flooding and its impacts are once more at the forefront of the community's concerns. The photo below was taken from the true right bank of the river on 23 October 2025. It shows how tall and invasive the poplars and willows in the riverbed have become and it shows how they are restricting the flow of the river in flood and likely causing, or at least exacerbating, the inundation of the land behind them.



23 October 2025

RPL considers that trees along the actual trail alignment have a high amenity value for walkers and cyclists and provide shade to users of the river. Trees could be encouraged along the trail edge (though preferably a species more suitable than willows would be planted). However, RPL submits that the circled trees that are in the riverbed should be removed, so that the flow of the river in flood conditions is not impeded. Any ecological planting should be limited to reeds and water edge species that would have been endemic to this part of the river and which would not impede the natural flow of the river. As is evident from the 1983 photograph, the beach would be retained by natural river processes and so would continue to provide a high amenity value to river users.

2. Trail network and river crossings

RPL was pleased to see pedestrian/trail crossings of the Kawarau River shown both in the vicinity of Boyd Road and upstream of Widgeon Park. Although the impetus to construct these bridges seems to have waned as NZTA has switched its focus back to motor vehicles, these two bridges remain an important part of the Active Travel and recreation trails networks.

RPL has recognised how its land on both sides of the Kawarau River could contribute to the Blue Green Network. RPL continues to manage and maintain both the upper and lower sections of the Twin Rivers Trail that adjoin Remarkables Park and has a good working relationship with the Trails Trust. In addition, RPL has been managing Queenstown Park Station with the development of future trails in mind.

RPL has some concern about how the trail route on true right bank of the Kawarau River has been shown on BG plans 4 and 5. RPL appreciates that, to some extent, the alignment of future trails is a

diagrammatic representation. However, given that the BG plans do show the actual alignments of the marginal strips and paper roads that adjoin the river, it should be possible to show the proposed trail alignments within these strips, rather than across areas of land that are actively farmed. RPL considers that, where it is practicable, the starting point should be that future trails should generally hug the riverbank. RPL notes that this is invariably the most pleasant environment and is also where most cyclists and walkers would choose to ride or walk.

RPL submits that the proposed trail along the true right bank of the Kawarau River between Boyd Road and the proposed crossing to Widgeon Park should be shown in its preferred location, close to the edge of the river.

3. Portrayal of the Shotover River confluence

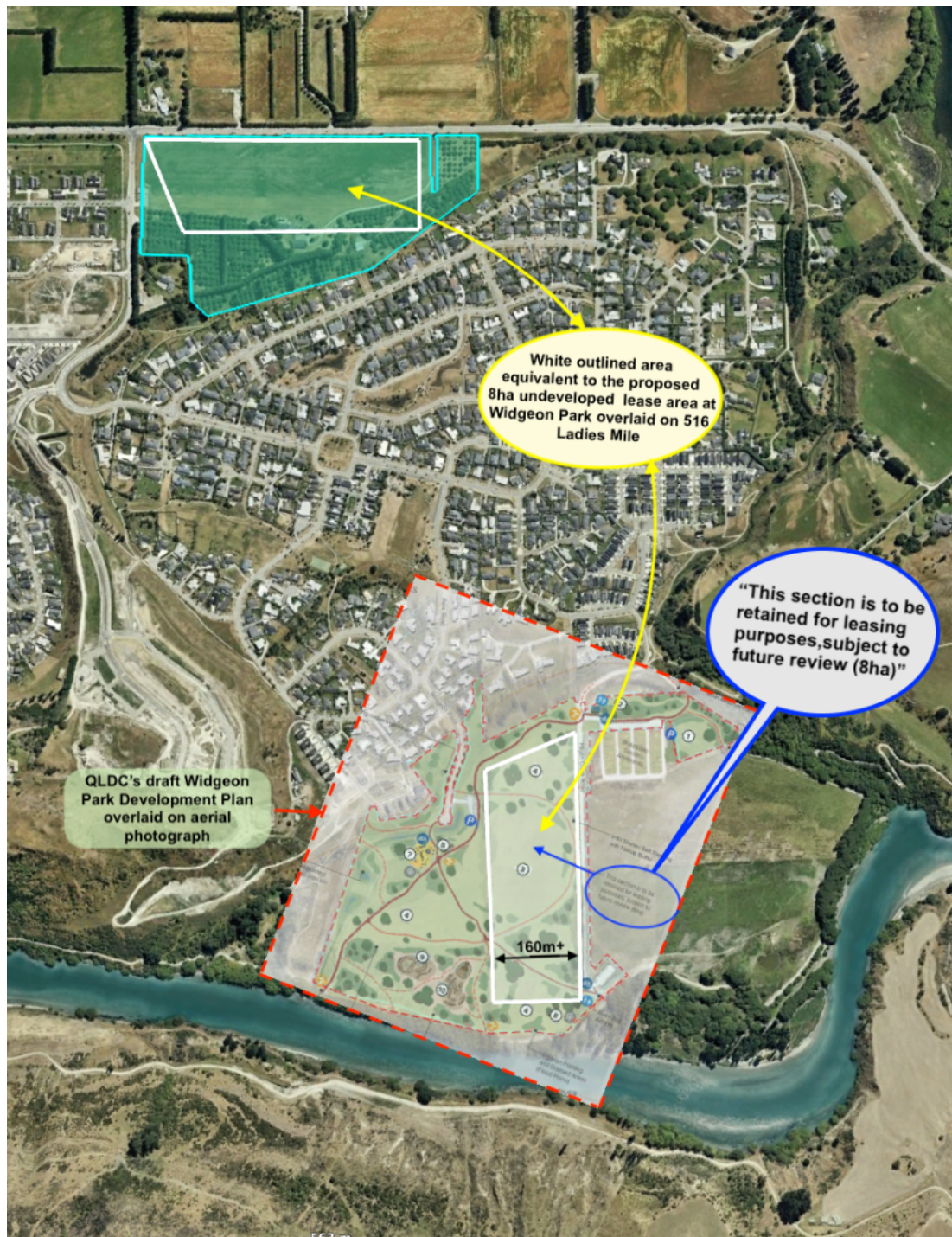
RPL appreciates that rivers can be shown as diagrammatic and that, especially in the case of braided rivers, that may be the best that can be hoped for. However, in the case of the Shotover River, since 2011 the training wall constructed by the ORC has redirected the main stem of the river towards the north east. The BGN maps for this area (see below) incorrectly show the main stem as meeting the Kawarau River towards the south west. This may seem trivial and perhaps even pedantic but, because the BGN plans are specifically intended to show both the waterways and the recreational paths and future recreational uses, this should be corrected.



Excerpt from BG Plan 4

the case of the eastern corridor, the BGNP is likely the first opportunity where the community and councillors have been able to see all of these areas on one plan. It may be the first opportunity to fully consider how some areas of land in Council's ownership might be used more effectively.

While councillors were recommended to include a \$5.4m expenditure item in the last Long Term Plan, to cover construction of new playing fields on freehold land at 516 Ladies Mile, that decision was made without the benefit of knowing how council parks staff are now proposing to use (or not use) Council's nearby reserve land at Widgeon Park. Council owns 21.6 ha of reserve land at Widgeon Park. The BGNP shows it being upgraded to a Community Park. But Widgeon Park has potential to be much more. The recently publicised draft reserve management plan for Widgeon Park shows an 8ha area as being left undeveloped and being "retained for leasing purposes – subject to future review".



The image above illustrates that any playing fields proposed for 516 Ladies Mile could be fully accommodated within the part of Widgeon Park that is identified as being left undeveloped. RPL submits that Councillors need to question why freehold land, that could be sold to return value to ratepayers, is proposed to be developed for recreation when Council already owns suitable reserve land within the eastern corridor.

The 8ha area at Widgeon Park is 160+ metres wide. Wide enough to accommodate a whole row of regulation length sports fields in an E-W orientation. Wide enough to accommodate even more regulation sports fields in a side-by-side N-S layout. Widgeon Park could accommodate all of the activities exactly as shown in the concept plan and still accommodate multiple sports fields.

On the other hand, the land at 516 Ladies Mile is too valuable to be used for sports fields, especially when less valuable land is already held by QLDC as reserve and is apparently only going to be leased for grazing.

QLDC's landholding at 516 Frankton-Ladies Mile is one of the best, undeveloped blocks of land in the Eastern Corridor. It has 594 metres of frontage onto Frankton-Ladies Mile, as well as road frontages onto both Howards Drive and an unformed legal road to the east. The land is freehold. It is not classified as reserve and there is no requirement on council to develop it for playing fields. Council is entitled to sell the land or develop it for other purposes.

There is a planted, sloping strip along the southern edge of the 14.6 ha site (which would ideally form part of the green network). This leaves 11.5 ha of flat land level with Frankton-Ladies Mile. A part of the flat area, say 3.5ha, could be utilised for a central, local park and for buildings for a community centre. This would still leave 8 ha of flat land, with a value in the vicinity of \$50m.



The image above shows the land values (as per QLDC's rating valuations) of similar sized blocks at Ladies Mile that are arguably less well-proportioned than the flat part of 516 Ladies Mile.

In RPL's submission, this surplus land should not be developed for sports fields. The Queenstown Lakes district community cannot afford such waste when other QLDC owned land is available. The surplus land should be sold. The proceeds could be used to off-set the original purchase price of the house and land at 516 Frankton - Ladies Mile; to develop a local park near Howards Drive; and to develop playing fields at Widgeon Park (though the Long Term Plan already shows \$5.4m being allocated for development of playing fields in the eastern corridor within the next two years and this money could be re-allocated to Widgeon Park). If council wanted to demonstrate real vision, it could also use a small portion of the proceeds to acquire the 16.8ha site adjoining Widgeon Park (current rating value \$2.8m). Or it could seek to acquire that land by way of exchange. The two sites could be recontoured to raise their level above the level of the Kawarau River in flood conditions and developed over time into a 40ha regional sports facility with: trail connections; frontage along a nationally recognised river; uninterrupted views of The Remarkables; and an alternative road access.

RPL submits that, as part of adopting the BGNP, questions should be asked as to why 516 Frankton-Ladies Mile has been proposed for the development of sports fields and whether it is indeed the best site. Was it just because the site is owned by QLDC and the original purchase decision has to be justified? Is it desirable to locate playing fields adjacent to a busy highway? Or will this just encourage spectators to stop their vehicles and park randomly alongside the road, as already happens in similar situations elsewhere in the district? Is the site as sheltered as the lower land at Widgeon Park? Will it provide as pleasant an environment for users and spectators as Widgeon Park could provide?

There will no doubt be nay-sayers who will point out that the land adjoining Widgeon Park has held water after heavy rainfalls and question its suitability for sports fields. But there are some simple engineering solutions; such as re-establishing and maintaining the high-level flow path on the inner bend of the river (as proposed earlier in this submission) and recontouring the land near the river edge at the upstream end of the site. There is also the option of raising the level of part of the site using material excavated from local construction sites. Contractors would pay to be able to place clean-fill in this location and it would be a sustainable use of that material. Look how quickly the Council-owned clean - fill site below the airport runway has filled up (while generating revenue for both Council and the site operator, who are both paid for every cubic metre of fill delivered to the site).

Likewise, the views of some of the residents of Lake Hayes Estate, as they relate to new activities, may need to be treated with caution. In 2019, Chris and Michaela Meehan sought to establish the Winton Tennis Centre on land adjacent to Widgeon Park. This philanthropic gesture would have seen two covered tennis courts, six uncovered courts and a tennis academy established for the Wakatipu community, on privately owned land near Widgeon Park, at no cost to council. This proposal was opposed by a group of Lake Hayes Estate residents and the resource consent application was declined. Let's please not let NIMBY attitudes like these prevail over the interests of the wider Queenstown Lakes district community.

Remarkables Park Limited and Queenstown Park Limited
per Brian Fitzpatrick
24 October 2025

24 October 2025

Queenstown Lakes District Council
10 Gorge Road
Queenstown 9300

Tēnā koutou,

Technical Advice on Blue Green Network Plan

1. Queenstown Lakes District Council (QLDC) is consulting on its draft Blue Green Network Plan, which maps out the parks, open spaces, trails, and waterways across Priority Development Areas and Settlements in the Queenstown Lakes District and identifies what should be protected, enhanced, and better connected as the district grows. Here, the National Public Health Service (NPHS) provides technical public health advice to support the Council to strengthen the plan to help achieve its stated intention to contribute to well-designed neighbourhoods, resilient communities, and a healthier environment, which affect the health and wellbeing of everyone in the region.
2. This technical advice has been compiled by the NPHS Te Waipounamu region, Health New Zealand – Te Whatu Ora. NPHS Te Waipounamu services the South Island, including the Queenstown-Lakes District.
3. NPHS Te Waipounamu, under the *Pae Ora (Healthy Futures) Act 2022* and *Health Act 1956*, has a statutory responsibility to improve, promote, and protect health and equity across communities. Achieving *Pae Ora* requires working with other sectors to address the environmental, social, and economic determinants of health.
4. NPHS is focused on the achievement of equitable health outcomes. The Ministry of Health/Manatū Hauora's definition of equity:

In Aotearoa New Zealand, people have differences in health that are not only avoidable, but unfair and unjust. Equity recognises different people with different levels of advantage require different approaches and resources to get equitable health outcomes (1).
5. This technical advice sets out matters of interest and concern to NPHS Te Waipounamu, and information included is based on evidence about public health and equity.
6. A wide range of factors beyond the health sector influence health and wellbeing. These factors are often referred to as the 'social determinants of health', and can be described as the environmental, economic, and social conditions in which people are born, grow, live, work, and age (2).

- The diagram on the next page shows how these determinants of health are complex and interlinked. Initiatives to improve health outcomes and overall quality of life must involve organisations and groups beyond the health sector, such as local government, if they are to have a collective impact (3). The following sections apply these principles to the Blue-Green Network Plan (BGNP).

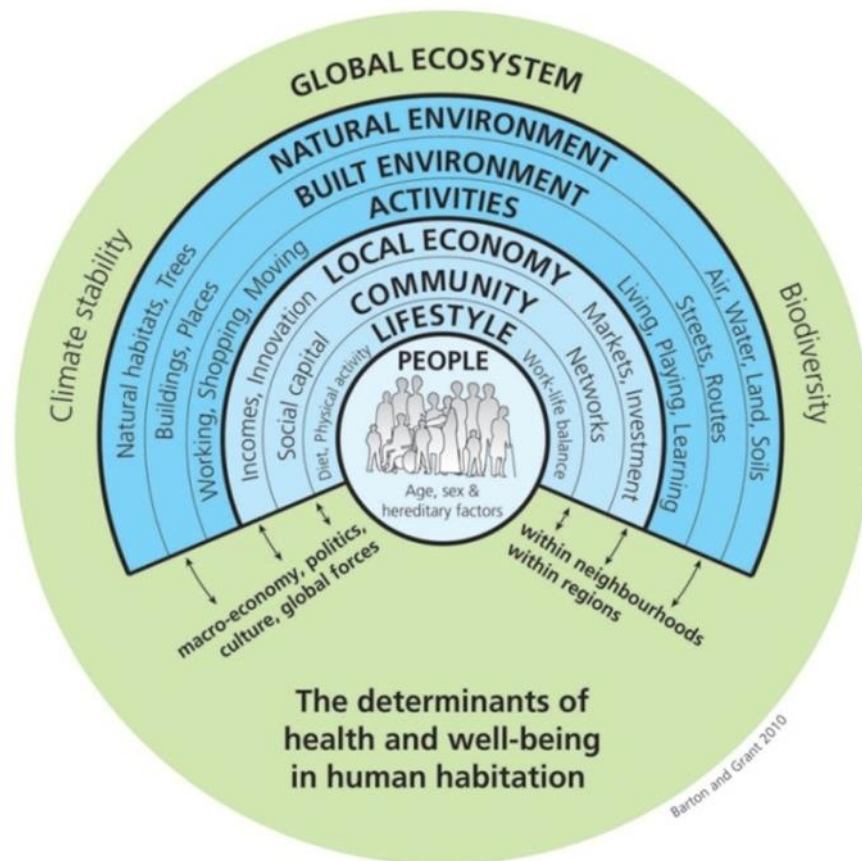


Figure 1: Social determinants of health

Health Equity in Urban and Environmental Planning

- NPBS acknowledges the important role that connected blue, green, and community spaces play in shaping healthy, sustainable, and resilient communities (4,5).
- NPBS is encouraged by the strong collaboration between QLDC, Otago Regional Council, mana whenua, and other stakeholders in the development of the BGNP. Given the clear links between environmental design, urban planning, and population health (4–6), NPBS Te Waipounamu would welcome the opportunity to contribute more directly to future planning processes (5). This would help ensure that health equity, wellbeing, and prevention are embedded from the outset, alongside environmental and cultural priorities.

10. Planetary health, urban planning, and public health are interconnected. Natural environments play a critical role in preventing the spread of diseases. Natural water filtration systems remove pollutants, reducing the risks of waterborne diseases. Preserving and restoring wetlands promotes water quality while also improving air quality, reducing flood risks, mitigating urban heat island effects. Better air quality leads to improvements in respiratory symptoms and cardiovascular health (7). Reducing flood risks reduces spread of infections and exacerbation of non-communicable diseases (8) while preventing vulnerable populations to be further disproportionately exacerbated, protecting their physical and mental health (9). Urban green spaces can reduce urban temperature by up to 5°C, which improves thermal comfort (10). The cumulative effects of these mitigation measures contribute to enhancing the overall quality of life and wellbeing. Urban planning decisions that integrate nature-based solutions can amplify these benefits and reduce health inequities (11).
11. NPHS Te Waipounamu recognises the importance of planning and development decisions that contribute to enhancing population health and reducing inequities (4,5,12). NPHS Te Waipounamu commends QLDC for engaging and incorporating recommendations from mana whenua.
12. Equity of access to green spaces and intergenerational equity concerns related to climate change have been identified in the BGNP. Spatial gaps have been highlighted, including walkability to parks, park provision and size, and public access to water, to name a few. This represents an excellent foundation for assessing spatial equity. To build on this, NPHS suggests the possibility of undertaking a Health and Equity Impact Assessment (HEIA)(13) or using the Health and Equity Impact Assessment (HEAT) tool (14) to comprehensively evaluate the health and equity impacts of the BGNP. This will help ensure the plan supports wellbeing across all communities and provides a framework for measuring improvements over time (15).
13. Universal design is the principle of designing open spaces, transport networks, and facilities that are accessible, usable, and welcoming for everyone, regardless of age, ability, or background, without adaptation or specialised design (16). Applying these principles ensures that all residents, including disabled people, older adults, whānau with young children, can safely access and benefit from the BGN (17). This may include wide, well-maintained paths, designated cycling paths, and clear signage. Paths should be wide enough for people with mobility challenges and people with prams. Designated separate cycleways may need to be incorporated to ensure the safety of both cyclists and pedestrians (11).
14. The evaluation of public parks and playgrounds' accessibility and usability is recommended to ensure that all people in the district can enjoy leisure and active transport at no cost (17). The PARC's tool from the University of Otago has been designed to do so and is being used by multiple councils around Aotearoa New Zealand. The tool is attached to the email with the technical advice.
15. Green infrastructure may require long-term maintenance and funding commitments (18). Providing opportunities for individuals and whānau to volunteer and contribute to the upkeep and maintenance of blue and green spaces can build a sense of ownership and responsibility among community members, while also enhancing social cohesion and significantly reducing maintenance costs (11,18).

Active Health Protection

16. The BGNP acknowledges the benefits of physical activity by proposing a network of trails that connect habitation to employment, services, waterways, parks, and recreation (11). Opportunities for people to be active in, on, or near water, such as safe spots for swimming, and for sports such as paddleboarding, canoeing, kayaking, and other opportunities, could be displayed on the BGNP maps to encourage physical activity further. Drinking fountains, seating, shelter, and shade can encourage longer sessions of physical activity and social connections, while protecting from dehydration and excessive sun exposure associated with cancer.
17. To enable community and whānau connections in a safe, healthy, and whānau-friendly environment, NPHS Te Waipounamu recommends designating the Blue Green Network as smokefree and vapefree, or for the council to implement a smokefree/vapefree outdoor public area policy. Many councils have already adopted a smokefree and vapefree outdoor public area policy (19).
18. Smokefree and vapefree spaces, including outside spaces, contribute to positive role modelling for tamariki and young people, while protecting their health. A smokefree and vapefree outdoor public area policy also reduces the risk of fire, as well as cleaning and maintenance costs (19).
19. The Alcohol-Free Areas in Public Places Bylaw 2018 already restricts alcohol consumption to specific zones and time frames. Signage might be needed to remind the public, inform tourists, and avoid anti-social behaviour, excessive noise, littering, as well as to promote inclusivity and safety (20,21). QLDC Alcohol-Free Areas in Public Places Bylaw 2018, part 3, section 10.1 signage, stipulates:

“Where it is practicable and reasonable to do so, the Council will erect signage within public places covered by this bylaw to provide information to the public about the restrictions imposed under the bylaw. The size, location, and terms of the signage will be at the Council’s discretion”.
20. Nature-based infrastructure, such as wetlands and floodplains, reduces the severity of natural hazards by absorbing floodwaters, lowering surface temperatures, and improving air quality. These co-benefits protect community health by reducing exposure to contaminants, heat stress, and displacement, and by maintaining safe routes and open refuges during emergencies (22–24). The BGNP contributes directly to emergency management and public health resilience. Open spaces, trails, and riparian areas provide essential gathering spaces and additional evacuation routes during extreme events such as flooding and wildfires (22–24). The National Adaptation Plan (2022) suggests providing data, information, and tools to enable communities to assess and reduce their own climate risks. As such, there is an opportunity for the BGN to be included in the QLDC GIS Data Download Tool to contribute to emergency management (22–24).

Partnership

21. NPHS Te Waipounamu seeks to collaborate closely in future stages of the Blue-Green Network’s development. Embedding public health considerations early in the planning process maximises opportunities for collective impact, such as ensuring that health equity, wellbeing,

and prevention are integrated alongside environmental and cultural priorities, rather than retrofitted at the consultation stage.

Conclusion

22. The NPHS Te Waipounamu commends QLDC for its holistic and forward-thinking approach in developing the Blue Green Network Plan (BGNP). The plan demonstrates a strong understanding of the interconnectedness between environmental design, community wellbeing, and health equity.
23. Applying public health tools such as a Health and Equity Impact Assessment (HEIA) or Health Equity Assessment Tool (HEAT) can support evidence-based decision-making, track progress over time, and ensure that benefits are shared equitably across communities.
24. By prioritising universal design, smokefree, vape-free, and alcohol-free environments, and the integration of nature-based and health-protecting infrastructure, the BGNP has the potential to deliver lasting co-benefits for people and the environment.
25. NPHS Te Waipounamu welcomes the opportunity to collaborate closely with QLDC, mana whenua, and regional partners to advance the shared vision of healthy, connected, and resilient communities across the district.
26. NPHS Te Waipounamu will wish to be heard with respect to this advice.

Ngā mihi,



Vince Barry

Regional Director
National Public Health Service
Te Waipounamu Region



Dr Virginia McLaughlin

Medical Officer of Health
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Te Waipounamu Region

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Kind Regards
Anita Golden
LHESCCA Chair
Phone: 0212221231

The Lakes Estate and Shotover Community Community Association applauds the vision of QLDC's Blue-Green Network Plan.

As a Priority Development Area our community is highly interested in ensuring that the upcoming development of Te Pūtahi is done so in a way that creates a community, not simply houses.

With a fast-growing community, we'd like to see development that enhances community connection, reduces the need for car travel and improves the health of our surrounding eco-systems.

Our comments on the opportunities are as follows:

Introduction

The introduction mentions "Open space usage within existing residential areas is often constrained in size and usability by the presence of a high voltage transmission line along the Corridor".

The Association believes that opportunities still exist to enhance the biodiversity values of these open areas. Rather than leave them bare, we would like to see low-growing shrubs remain in such open areas.

5.02 - Shotover River - Riparian planting of Shotover River

We strongly support the opportunity to amplify the restoration work done by Shotover Primary School and the Wakatipu Reforestation Trust in the **wetland area**. We do note however that a braided river terrace wouldn't naturally have riparian plants. It needs room to move and to allow for lots of different types of ecosystems. We would encourage the commissioning of research from a freshwater ecologist to inform any restoration plans for the Shotover River.

5.05 - 516 Ladies Mile - Addition of a Community Facility & Premier Sportsground

This venue is eagerly awaited by the community. Having core amenities within walking/biking distance for 7500 residents will reduce the amount of traffic moving toward Frankton Flats and have positive impacts on both physical and environmental health. Additionally it will create more opportunities for casual connection between community members. We strongly suggest that this facility include a purpose-built library. Libraries are an essential 'third place' for a community, acting as a meeting point, a place of leisure and a hub for public programmes that is framed explicitly around social rather than commercial purposes. We are fortunate to have a contemporary and well-resourced library network in Queenstown-Lakes but the Frankton Library is nearing capacity. With a potential future population of 12,000 residents in Te Pūtahi/Eastern Corridor, investing in a library that is walkable/bikeable will pay dividends in fostering a culture of community engagement and inclusivity.

5.06 - Te Pūtahi Ladies Mile Parks

We expect that these parks will remain consistent with the size and scope laid out in this plan, even if pressure comes on for additional housing or to move the park locations. Concentrated spots of wild nature in this soon-to-be densely populated area are crucial to the well-being of future residents. We would encourage these parks to be planted early in the development process with native and ecologically appropriate species and benches or tables to be incorporated.

5.07 - Lake Hayes to Shotover Bridge Active Travel

This is a desirable piece of the transport network that will encourage more of our community to travel by bike to the Frankton area. Perceived safety is an important part of mode shift so we encourage QLDC to allow for a cycle lane that is separated from the traffic flow on SH6. Also consider the crossing points on SH6 for safe and fast travel from LHE and SC to the proposed destination point on the other side. It is important that residents find it safer and faster to walk or travel by bike to get across SH6 than to jump in their cars. A roundabout will not achieve this so a signalised crossing with bike priority is desirable at both the Stalker Rd and Howards Dr entrances.

5.08 Slope Hill - Trails connecting to and around Slope Hill

This is an amazing opportunity that will add to the breadth of activity options on our front door steps and connect residents to the biodiversity restoration efforts happening around Slope Hill.

Appendix A: PARC's -Evaluation tool for assessing the accessibility and usability of community parks and playgrounds

Park/Playground name _____

Observer Name _____

Observation Date ____/____/____

Observation Start time _____ am/pm

Observation End time _____ am/pm

Total amount of observation time _____ minutes

Current Weather Conditions (approximate temp; clear/cloudy) _____

Section A1 - Approachability to the park –Parking Spaces and bus routes (Please circle how accessible are they for the following?)		
Does the facility have a parking lot, parking structure, or parking area? (not scored) If No then score No from Q1 to Q9	Yes	No
1. Are there any accessible car parks?	Yes	No
2. Do parking spaces have signage for an accessible car park?	Yes	No
3. Do parking spaces that are designated as accessible have a clear width* of at least 3.5m?	Yes	No
4. Do parking spaces that are designated as accessible have a clear length* of at least 5m?	Yes	No
5. If parking spaces marked as accessible have access aisles, do they have a clear width of at least 1m?	Yes	No
6. Are the surfaces firm and stable to accommodate a wheelchair in all weather?	Yes	No
7. Are accessible parking spaces kept free from obstacles?	Yes	No
8. Does the facility have a ticket machine for parking lot access?	Yes	No
9. If the facility parking lot(s) use ticket machines, can the driver obtain the ticket while remaining seated on the driver's side of the car?	Yes	No
10. How far away is the closest bus stop from the main entrance of the park? (> 20m = No) _____m	Yes	No
*Any safety concerns:		
Other comments:		

A2 Path surfaces (Please circle how accessible are they for the following?)		
Scoring		
11. Are the main paths to areas (playgrounds/toilets/water fountains) wider than 1.5m?	Yes	No
12. Are there tactile markers to denote changes in path direction?	Yes	No
13. Are the surfaces regular/even? Please mark NO if there are irregular surfacing, joins, sloping sections, cracks, holes, 5mm or more	Yes	No
14. Are the surfaces stable? Please mark NO if the surface contains loose gravel, sand, bark, clay etc	Yes	No
15. Routes without steps?	Yes	No
16. Low kerbs (<4cm)?	Yes	No
17. Are the gradients of all the kerb ramps <1:8? (must be less than 7.1 degrees or 12%)	Yes	No
18. Are the gradients of the paths in the park less than 1:14? (must be less than 4.1 degrees or 7%) <i>HINT: Even a small portion of the path with a gradient greater than this may make this path unusable. Consider someone self-propelling a wheelchair.</i>	Yes	No
19. Are there handrails on paths with steep gradients in the park?	Yes	No
20. Presence of lighting along main paths? Please mark NO if there is no/poor/uneven/dazzling lighting along the circulation paths	Yes	No
*Any safety concerns (e.g. unstable surface, broken glasses or metals on the floor)		
Other comments		

Section B1 Play areas and equipment usability (Please circle how accessible are they for the following?)		
Does the facility have a play area? (not scored) If no go to next domain.	Yes	No
1. Are there separate play areas for different age groups?	Yes	No
If no, continue on to main play equipment section. If yes, complete main play equipment and pre-school play equipment section		
Main play equipment section		
2. Are the play areas fenced (greater than 1.2 metres)?	Yes	No
3. Number of ground level play components? <i>HINT: What can be reached from the ground. Ramps, transfer systems, steps, decks, and roofs are not considered play equipment. A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure. Swings, spring riders, water tables, playhouses, slides, and climbers are among the many different play components</i>		
a. All ground level play components are accessible <i>HINT: Consider if this is a 'boxed' area or whether some ground level components are blocked.</i>	Yes	No
b. Are the accessible routes to ground level play components at least 1.5m wide?	Yes	No
c. Are the surfaces regular/even? <i>Please mark NO if there are irregular surfacing e.g. tiles lifting up, uneven joins, sloping sections, cracks, holes, 5mm or more</i>	Yes	No
d. Are the surfaces stable? <i>Please mark NO if you the surface contains loose gravel, wood chips, sand clay etc</i>	Yes	No

Main play equipment section (contd) (scoring)			
4.	Number of elevated play components? <i>HINT Ramps, transfer systems, steps, decks, and roofs are not considered play equipment. A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure e.g. Swings, spring riders, water tables, playhouses, slides, and climbers.</i>		
	a. At least 50% of the elevated play components must have an accessible route <i>HINT: Consider ramps of natural topography to allow other to the top levels</i>	Yes	No
	b. Are the elevated access routes 0.9m wide?	Yes	No
	c. Is the height of handrail gripping surface between 0.5m to 0.7m from the ground? <i>HINT: Handrails are different from guardrails. Handrails are to help children balance whereas guardrails are to prevent children falling</i>	Yes	No
	d. Is there a manoeuvrable space of 1.5m wide present in the access route?	Yes	No
	e. Are ramps to the elevated equipment present?	Yes	No
	f. If ramps are present, are they 0.9m wide with handrails?	Yes	No
	g. If ramps are present, the landings must be at least 1.5m wide	Yes	No
	h. Are transfer steps present to enable access to elevated equipment present <i>HINT: (i.e. large flat areas/platforms to allow access to higher structures)</i>	Yes	No
	i. If transfer steps are present, the minimum width of transfer platforms must be 0.61m	Yes	No
	j. If transfer steps are present, the height of transfer platforms between 0.45m to 0.28m	Yes	No
	k. If transfer steps are present, are there unobstructed sides to the transfer platforms?	Yes	No
	l. If transfer steps are present, is the maximum height of transfer steps 0.2m?	Yes	No
5.	Are there play areas or items which require stepping into or crawling into (<i>e.g. tunnel or bubble window</i>)	Yes	No
6.	If there are items which require being stepped into, is the bottom lip between 0.28m to 0.6m? <i>HINT: e.g. is the bottom lip of a tunnel between 0.28m to 0.6m off the ground?</i>	Yes	No
7.	Are there play tables? <i>HINT: Play tables are surfaces, boards, slabs, or counters that are created for play.</i>	Yes	No

8. If there are play tables, are they a minimum of 0.61m height X 0.76m wide X 0.43m depth?	Yes	No
9. Do the reach ranges to play components satisfy the following criteria		
a. 0.5m to 0.91m for 3 to 4 year-olds?	Yes	No
b. 0.45m to 1m for 5 to 8 year-olds	Yes	No
c. 0.4m to 1.1m for 9 to 12 year-olds	Yes	No
10. Visual information		
a. Are there high contrast colours between play equipment and the orientation path?	Yes	No
b. Are there high contrast colours to indicate different heights?	Yes	No
c. Are the colours of the surfacing material different within and outside a fall zone? <i>HINT: the fall zone is the area under and around a piece of equipment where a child might land or exit that equipment.</i>	Yes	No
*Any safety concerns (e.g. rust, maintenance issues in play equipment and play area)?		
Other comments		

Main Playground. Sensory stimulation/Play richness (Please circle how accessible are they for the following?)		
11. Vestibular stimulation (Please circle how accessible are they for the following?)		
a. Spinning	Yes	No
b. Sliding	Yes	No
c. Sliding- the ability to slide two people side by side	Yes	No
d. Rocking	Yes	No
e. Swing – Presence of full body support swing (e.g. nested swing)	Yes	No
f. Climbing/Crawling	Yes	No
12. Visual stimulation		
a. Is there equipment which provides visual stimulation (e.g. coloured lights/mirrors/black and white)	Yes	No
13. Olfactory stimulation		
a. Plants/herbs to stimulate smell	Yes	No
14. Tactile stimulation		
a. Is there play equipment providing opportunities for tactile stimulation (e.g. rocks/sand/dirt/water/rice/grass/mirrors/marbles)	Yes	No
15. Auditory stimulation		
a. Is there play equipment providing auditory stimulation (e.g. echoes/chimes/talking tubes)	Yes	No

Pre_school play equipment section (Please circle how accessible are they for the following?)		
16. Are the play areas fenced (greater than 1.2 metres)?	Yes	No
17. Number of ground level play components? <i>HINT: What can be reached from the ground. Ramps, transfer systems, steps, decks, and roofs are not considered play equipment. A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure. Swings, spring riders, water tables, playhouses, slides, and climbers are among the many different play components.</i>		
a. All ground level play components are accessible <i>HINT: Consider if this is a 'boxed' area or whether some ground level components are blocked.</i>	Yes	No
b. Are the accessible routes to ground level play components at least 1.5m wide?	Yes	No
c. Are the surfaces regular/even? <i>Please mark NO if there are irregular surfacing e.g. tiles lifting up, uneven joins, sloping sections, cracks, holes, 5mm or more</i>	Yes	No
d. Are the surfaces stable? <i>Please mark NO if you the surface contains loose gravel, wood chips, sand clay etc</i>	Yes	No
18. Number of elevated play components? <i>HINT Ramps, transfer systems, steps, decks, and roofs are not considered play equipment. A play component is an element designed to generate specific opportunities for play, socialization, and learning. Play components may be manufactured or natural, and may be stand alone or part of a composite play structure e.g. Swings, spring riders, water tables, playhouses, slides, and climbers.</i>		
19. At least 50% of the elevated play components must have an accessible route <i>HINT: Consider ramps of natural topography to allow other to the top levels</i>	Yes	No
a. Are the elevated access routes 0.9m wide?	Yes	No
b. Is the height of handrail gripping surface between 0.5m to 0.7m from the ground? <i>HINT: Handrails are different from guardrails. Handrails are to help children balance whereas guardrails are to prevent children falling.</i>	Yes	No
c. Is there a manoeuvrable space of 1.5m wide present in the access route?	Yes	No
d. Are ramps to the elevated equipment present?	Yes	No
e. If ramps are present, are they 0.9m wide with handrails?	Yes	No
f. If ramps are present, the landings must be at least 1.5m wide	Yes	No
g. Are transfer steps present to enable access to elevated equipment present <i>HINT: (i.e. large flat areas/platforms to allow access to higher structures)</i>	Yes	No
h. If transfer steps are present, the minimum width of transfer platforms must be 0.61m	Yes	No

i. If transfer steps are present, the height of transfer platforms between 0.45m to 0.28m	Yes	No
j. If transfer steps are present, are there unobstructed sides to the transfer platforms?	Yes	No
k. If transfer steps are present, is the maximum height of transfer steps 0.2m?	Yes	No
l. Are there play areas or items which require stepping into or crawling into (<i>e.g. tunnel or bubble window</i>)	Yes	No
20. If there are items which require being stepped into, is the bottom lip between 0.28m to 0.6m? <i>HINT: e.g. is the bottom lip of a tunnel between 0.28m to 0.6m off the ground?</i>	Yes	No
21. Are there play tables? <i>HINT: Play tables are surfaces, boards, slabs, or counters that are created for play.</i>	Yes	No
22. If there are play tables, are they a minimum of 0.61m height X 0.76m wide X 0.43m depth?	Yes	No
23. Do the reach ranges to play components satisfy the following criteria		
24. 0.5m to 0.91m for 3 to 4 year-olds?	Yes	No
a. Visual information		
25. Are there high contrast colours between play equipment and the orientation path?	Yes	No
a. Are there high contrast colours to indicate different heights?	Yes	No
b. Are the colours of the surfacing material different within and outside a fall zone? <i>HINT: the fall zone is the area under and around a piece of equipment where a child might land or exit that equipment.</i>	Yes	No
*Any safety concerns (e.g. rust, maintenance issues in play equipment and play area)?		
Pre-School Playground. Sensory stimulation/Play richness (Please circle how accessible are they for the following?)		
Vestibular stimulation		
26. Spinning	Yes	No
a. Sliding	Yes	No
b. Sliding- the ability to slide two people side by side	Yes	No
c. Rocking	Yes	No

d. Swing – Presence of full body support swing (e.g. nested swing)	Yes	No
e. Climbing/Crawling	Yes	No
f. Visual stimulation		
27. Is there equipment which provides visual stimulation (coloured lights/mirrors/black and white)	Yes	No
28. Olfactory stimulation		
a. Plants/herbs to stimulate smell	Yes	No
29. Tactile stimulation		
a. Is there play equipment providing opportunities for tactile stimulation (rocks/sand/dirt/water/rice/grass/mirrors/marbles)	Yes	No
30. Auditory stimulation		
a. Is there play equipment providing auditory stimulation (echoes/chimes/talking tubes)	Yes	No

B3 – Restrooms (Please circle how accessible are they for the following?)	
Does the facility have a restroom? If no, go to next domain.	Yes No
31. Is the route to the toilet accessible?	Yes No
32. Do the doors of restrooms have power assist*?	Yes No
33. Is a pushbutton available to open the doors?	Yes No
34. Do the restroom doors open automatically?	Yes No
35. Do restroom doors have a clear width* greater than 0.8m?	Yes No
36. Is there an unobstructed turning radius of at least 1.5m in front of restroom doors?	Yes No
37. Do toilet stall doors have a clear width* of at least 0.9m?	Yes No
38. Do toilet stall doors swing towards the area outside of the stall?	Yes No
39. Are accessible toilet stalls at least 1.5m wide and at least 1.5m long/deep?	Yes No
40. Is the distance from the centre of the toilet to the stall wall at least 0.45m?	Yes No
41. Are flush controls mounted 1.1m or less above the floor?	Yes No
42. Is the toilet seat 0.4 to 0.5m high from the floor?	Yes No
43. Is the centre of toilet paper dispensers 0.5m or less from the floor?	Yes No
*Any safety concerns (e.g. rust, maintenance issues, slippery floor)	
Other Comments	

B4 Drinking fountain (scoring) (Please circle how accessible are they for the following?)		
Does the facility have a drinking fountain? If no mark all in this section no	Yes	No
44. Are water fountain controls operable without the need for tight grasping, pinching, or twisting of the wrist?	Yes	No
45. Are water fountain controls on the front or side of the unit?	Yes	No
46. Is there a clear floor space in front of the unit that is at least 0.75m wide AND at least 1.2m long/deep?	Yes	No
47. . Is there at least 0.45m of clearance space (measured from the wall) beneath the water fountain to allow for wheelchair access?	Yes	No
48. Is the spout height 0.9m or less as measured from the floor to the spout outlet?	Yes	No
49. Are the bottoms of water fountains 0.6m or more from the ground?	Yes	No
50. Are they mounted at different heights, serving seated and standing users?	Yes	No
*Safety concerns (rust, guttering)		
Other comments		

General notes and other comments about the facility:

Note: *The inter-rater reliability of safety comments was not evaluated

Attachment 1

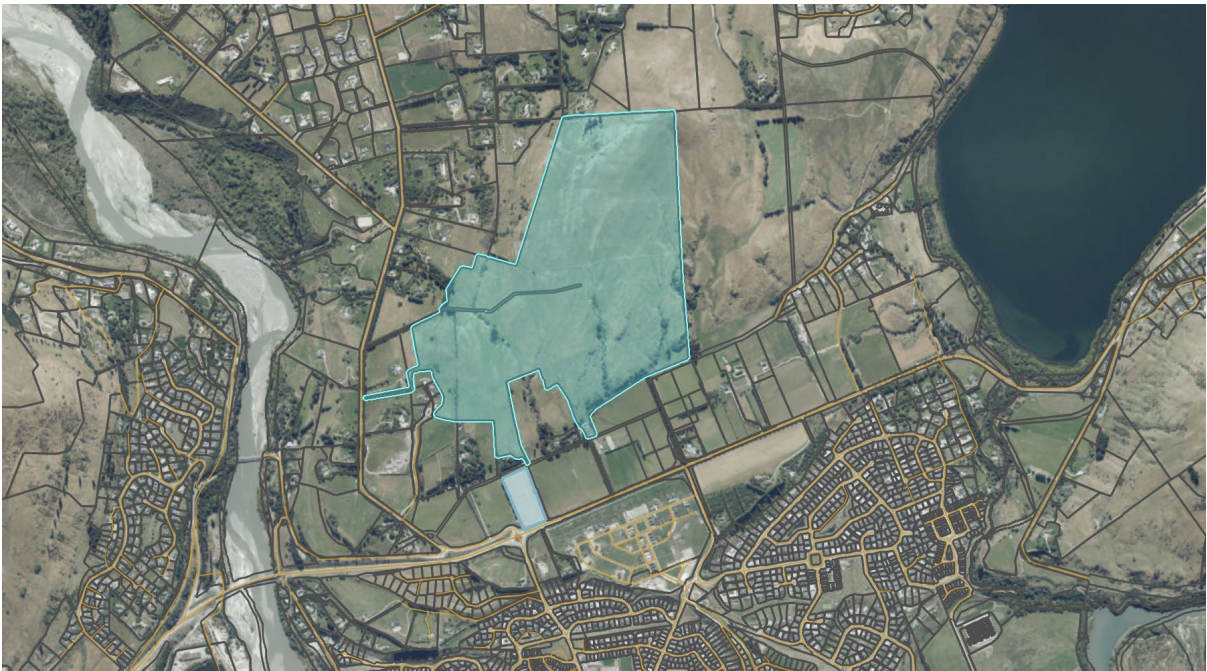


Figure 1: Grant Stalker Trust land shown in blue.

12 December 2025

Queenstown Lakes District Council

Comments from Maryhill Limited on QLDCs draft Blue Green Network Plan

We provide comments on the Council's draft Blue Green Network Plan (**BGN Plan**), dated September 2025. We understand that feedback on the BGN Plan closes on 12 December 2025.

These comments are provided on behalf of Maryhill Limited (**Maryhill**), which owns land that is directly impacted by some elements shown in the Local Te Pūtahi / Eastern Corridor Plan. A map depicting Maryhill's land that is impacted by the Blue Green Network Plan is included in **Attachment 1** to these comments.

A large part of Maryhill's land is subject to the Te Pūtahi Ladies Mile Zone (**TPLM**) which has recently been made operative. This zone provides a highly prescriptive planning framework to enable development and residential density outcomes for the land, as well as ensuring there is an integrated approach to transportation, green spaces and 3-water services. Maryhill also owns the southern slope of Slopehill, which is not included in the TPLM Zone.

Maryhill's comments on the draft Blue Green Network Plan primarily relate to:

- The inclusion of features on private land;
- How the BGN Plan will be implemented and the implications the BGN Plan will have on landowners directly affected by the plan.

In brief, Maryhill seeks that the 'Local Te Pūtahi / Eastern Corridor Plan' be removed from the Blue Green Network Plan and that the TPLM Structure Plan, which is part of the District Plan, is instead used to guide the development of this area. In the alternative, Maryhill seeks that the proposed trail and ecological areas on its privately owned land are removed from the BGN Plan.

Use of Private Land for Blue Green Features

Ecology -Proposed

The BGN Plan also shows proposed 'ecology' areas around the 'existing waterways' located on the southern face of Slopehill and onto the flats of Ladies Mile. The location of the existing waterways appears very rudimentary and therefore is unlikely to be accurate. The waterways have the 'Ecology-Proposed' overlay on them, which is understood to be areas where ecological restoration is encouraged, through the removal of pest species and establishing or enhancing vegetated areas along waterways to filter runoff, reduce erosion, and provide habitat.

It is not clear what the implications of having areas of 'Ecology-Proposed' will be for private land owners such as Maryhill. Maryhill seeks that the Ecology-Proposed areas are removed from its property.

Parks - Proposed

Areas of 'Parks- Proposed' are also shown on Maryhill's land. It is understood that these parks largely align with the Open Space areas shown in the TPLM Structure Plan. Maryhill questions the necessity of including the parks in the BGN Plan if they are already in the TPLM Structure Plan. As the TPLM Structure Plan is implemented, the accuracy and relevance of the BGN Plan will become outdated, and this may result in conflicts with the implementation of both the TPLM Structure Plan and the BGN Plan. In its experience, conflicts between Council documents leads to costly and time consuming delays in resource consenting processing. Therefore, to avoid unnecessary duplication that may lead to future inconsistencies and conflicts, Maryhill seeks that the Te Pūtahī/Eastern Corridor Plan is removed from the BGN Plan, and that the operative TPLM Structure Plan is instead used to guide development in this area.

Implementation of the Blue Green Network Plan

It is unclear from the draft document how BGN Plan will be implemented, and what statutory weight it will hold. We understand that it could be considered via a resource consent application process under section 104(1)(c) of the RMA which allows for 'any other matter the consent authority considers relevant and reasonably necessary to determine the application' to be taken into consideration.

Page 5 of the BGN Plan states:

"The BGN Plan will, in turn, inform smart decisions on future land use and the built environment to help achieve multiple benefits from investment and prioritise capital and operational spending on open space that meets the needs of our growing and changing community....As land and/or development opportunities arise, it allows communities and developers to see how an area or particular landholding could positively contribute to the Blue Green Network."

Given the ability to take the BGN Plan into consideration for resource consent applications, Maryhill are concerned that the proposed trails and other proposed features that are on private land may be considered enforceable by Council via a resource consent process.

Maryhill was not consulted in the development of the BGN Plan, and were surprised to see the proposed trail and 'ecology' areas shown on its Slopehill property. As a private landowner, Maryhill does not consider the inclusion of trails and other assets on private land to be acceptable or reasonable. It is concerned that the Council will consider the BGN Plan to be a fait accompli and hold up any proposals to develop Slopehill, which could include the development of the Council water supply for TPLM, until land for the trails or an undertaking to carry out ecological restoration is committed to. In its view, such a process would not align with the effects management regime of the RMA. Maryhill therefore seeks that all proposed trails, Ecological-Proposed areas or other features in the BGN Plan that are on private land are removed from the BGN Plan. If Council seeks to establish these assets, then it should approach the landowner directly and negotiate in good faith.

Please get in touch if you require clarification on any matters raised in these comments.



Kristan Stalker

11th November 2025

Queenstown Lakes District Council

Dear Sir/Madam

Comments from the Grant Stalker Trust on QLDCs draft Blue Green Network Plan

The Grant Stalker Trust (Stalker Trust) is disappointed to be forced to provide comments on the Council's draft Blue Green Network Plan (**BGN Plan**), dated September 2025. We understand that feedback on the BGN Plan closes on 12 December 2025.

These comments are provided on behalf of the Stalker Trust which owns land that is directly impacted by some elements shown in the Local Te Pūtahi / Eastern Corridor Plan. A map depicting Stalker Trust land that is impacted by the Blue Green Network Plan is included in **Attachment 1** to these comments.

A component of Stalker Trust land is subject to the Te Pūtahi Ladies Mile Zone (**TPLM**) which has recently been made operative. This zone provides a highly prescriptive planning framework to enable development and residential density outcomes for the land, as well as ensuring there is an integrated approach to transportation, green spaces and 3-water services. Stalker Trust also owns a significant amount of Slopehill, which is not included in the TPLM Zone.

Stalker Trust comments on the draft Blue Green Network Plan primarily relate to:

- The inclusion of features on private land;
- How the BGN Plan will be implemented and the implications the BGN Plan will have on landowners directly affected by the plan.

In brief, Stalker Trust seeks that the 'Local Te Pūtahi / Eastern Corridor Plan' be removed from the Blue Green Network Plan and that the TPLM Structure Plan, which is part of the District Plan, is instead used to guide the development of this area. In the alternative, Stalker Trust seeks that the proposed trail and ecological areas on its privately owned land are removed from the BGN Plan.

Use of Private Land for Blue Green Features

Proposed Trail

Stalker Trust property includes Slopehill, which is identified as an Outstanding Natural Feature, and is zoned Rural in the Proposed District Plan. This area is an operational farm. Slopehill is not included in the TPLM Zone and is therefore not subject to the TPLM Structure Plan. Figure 51 of the BGN Plan (Te Pūtahi/Eastern Corridor Priority Plan) includes a new 'trail – approximate route' on Slopehill (reference 5.08). The description for this proposed trail is: "*Trails connecting to and around Slope Hill, and associated arrival node*".

Establishing a walking track on Slopehill is not feasible for health and safety reasons, due to the possible conflict with the farm operation. Stalker Trust strongly opposes the identification of the walking tracks on its land. Stalker Trust seeks that these trails are removed from the BGN Plan.

Ecology -Proposed

The BGN Plan also shows proposed 'ecology' areas around the 'existing waterways' located on the southern face of Slopehill. The location of the existing waterways appears very rudimentary and therefore is unlikely to be accurate. The waterways have the 'Ecology-Proposed' overlay on them, which is understood to be areas where ecological restoration is encouraged, through the removal of pest species and establishing or enhancing vegetated areas along waterways to filter runoff, reduce erosion, and provide habitat.

It is not clear what the implications of having areas of 'Ecology-Proposed' will be for private landowners such as Stalker Trust. Stalker Trust seeks that the Ecology-Proposed areas are removed from its property.

Parks - Proposed

Areas of 'Parks- Proposed' are also shown on Stalker Trust land. It is understood that these parks largely align with the Open Space areas shown in the TPLM Structure Plan. Stalker Trust questions the necessity of including the parks in the BGN Plan if they are already in the TPLM Structure Plan. As the TPLM Structure Plan is implemented, the accuracy and relevance of the BGN Plan will become outdated, and this may result in conflicts with the implementation of both the TPLM Structure Plan and the BGN Plan. In its experience, conflicts between Council documents leads to costly and time consuming delays in resource consenting processing. Therefore, to avoid unnecessary duplication that may lead to future inconsistencies and conflicts, Stalker Trust seeks that the Te Pūtahi/Eastern Corridor Plan is removed from the BGN Plan, and that the flexibility of the operative TPLM Structure Plan is instead used to guide development in this area.

Implementation of the Blue Green Network Plan

It is unclear from the draft document how BGN Plan will be implemented, and what statutory weight it will hold. We understand that it could be considered via a resource consent application process under section 104(1)(c) of the RMA which allows for 'any other matter the consent authority considers relevant and reasonably necessary to determine the application' to be taken into consideration.

Page 5 of the BGN Plan states:

"The BGN Plan will, in turn, inform smart decisions on future land use and the built environment to help achieve multiple benefits from investment and prioritise capital and operational spending on open space that meets the needs of our growing and

changing community....As land and/or development opportunities arise, it allows communities and developers to see how an area or particular landholding could positively contribute to the Blue Green Network."

Given the ability to take the BGN Plan into consideration for resource consent applications, Stalker Trust are concerned that the proposed trails and other proposed features that are on private land may be considered enforceable by Council via a resource consent process.

Stalker Trust was not consulted in the development of the BGN Plan, and were surprised to see the proposed trail and 'ecology' areas shown on its Slopehill property. As a private landowner, Stalker Trust does not consider the inclusion of trails and other assets on private land to be acceptable or reasonable. It is concerned that the Council will consider the BGN Plan to be a fait accompli and hold up any proposals to develop Slopehill, which could include the development of the Council water supply for TPLM, until land for the trails or an undertaking to carry out ecological restoration is committed to. In its view, such a process would not align with the effects management regime of the RMA. Stalker Trust therefore seeks that all proposed trails, Ecological-Proposed areas or other features in the BGN Plan that are on private land are removed from the BGN Plan. If Council seeks to establish these assets, then it should approach the landowner directly and negotiate in good faith.

Stalker Trust reiterates its disappointment in being surprised and consequently forced to submit on the QLDC's draft Blue Green Network Plan over its privately owned and operated land.

A handwritten signature in blue ink, appearing to read 'Kristan Stalker', with a stylized flourish at the end.

Kristan Stalker on behalf of the Grant Stalker Trust