

THE HILLS RESORT LIMITED

Request for a Change to the Proposed Queenstown Lakes District Plan

Evaluation under section 32 of the Resource Management Act 1991

14 November 2024

BROWN & COMPANY
P L A N N I N G G R O U P



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1. Introduction

The Hills Resort Limited (**THRL**) is requesting a change (the **Change**) to the Queenstown Lakes Proposed District Plan (**PDP**) to enable amendments to locations and extents of the Activity Areas on the Structure Plan for The Hills Resort Zone (**THRZ**), and to increase the number of Homesites available for residential purposes in the southern part of THRZ.

DOCUMENT 1 sets out the background to and reasons for this requested Change. The amendments requested to the PDP are set out in **DOCUMENT 2**. The effects on the environment are assessed in **DOCUMENT 3**.

Any change to a plan needs to be evaluated in accordance with section 32 of the Resource Management 1991 (the **Act**). This document (**DOCUMENT 4**) sets out the s32 evaluation for the Change.

Section 32 states:

- 32 Requirements for preparing and publishing evaluation reports**
- (1) An evaluation report required under this Act must—**
- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and**
 - (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—**
 - (i) identifying other reasonably practicable options for achieving the objectives; and**
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and**
 - (iii) summarising the reasons for deciding on the provisions; and**
 - (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.**
- (2) An assessment under subsection (1)(b)(ii) must—**
- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—**
 - (i) economic growth that are anticipated to be provided or reduced; and**
 - (ii) employment that are anticipated to be provided or reduced; and**
 - (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and**
 - (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.**
- (3) If the proposal (an amending proposal) will amend a standard, statement, regulation, plan, or change that is already proposed or that already exists (an existing proposal), the examination under subsection (1)(b) must relate to—**
- (a) the provisions and objectives of the amending proposal; and**
 - (b) the objectives of the existing proposal to the extent that those objectives—**
 - (i) are relevant to the objectives of the amending proposal; and**
 - (ii) would remain if the amending proposal were to take effect ...**

This evaluation is structured as follows:

- Part 2: The purpose of the Act, objectives of the proposal, options and examination**
- Part 3: Examination of the provisions of the proposal in achieving the objectives**
- Part 4: The risk of acting or not acting**
- Part 5: Evaluation of the provisions under the relevant PDP objectives**
- Part 6: Evaluation of the provisions under the regional planning instruments**
- Part 7: Evaluation of the provisions under the national planning instruments**
- Part 8: Summary and conclusions**

The evaluation relies on the description and other information provided in **DOCUMENT 1**, the various supporting technical reports (**DOCUMENTS 5 – 7**) and the assessment of effects on the environment (**AEE**) (**DOCUMENT 3**), noting that the AEE relies on the supporting technical reports.

2. Section 32(1)(a): the purpose of the Act, objectives of the proposal, options and examination

2.1 Purpose of the Act

The purpose of the Act is set out in Section 5 of the Act:

5 Purpose

- (1) *The purpose of this Act is to promote the sustainable management of natural and physical resources.***
- (2) *In this Act, sustainable management means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural well-being and for their health and safety while —***
 - (a) *sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and***
 - (b) *safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and***
 - (c) *avoiding, remedying, or mitigating any adverse effects of activities on the environment.***

The purpose of the Act is to promote the sustainable management of natural and physical resources. This has an enabling component (using, developing and protecting resources to enable wellbeing) and a regulating component (sustaining the potential of resources to meet the reasonably foreseeable needs of future generations; safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and avoiding, remedying, or mitigating any adverse effects of activities on the environment).

The purpose is given effect to by the hierarchy of national, regional and district-level planning instruments. These are addressed in more detail in Parts 5 – 7 below.

2.2 Objectives of the proposal

THRL's overall objective¹ is to deliver a world class golfing experience and golf resort with resort accommodation and facilities centred around a redesigned championship golf course of international ranking and world renown.

The Change is not required to undertake the golf course redesign, which can occur as of right, under the existing HRZ zone framework. However, as a result of the golf course redesign, the location and extent of the existing Activity Areas as codified in the Structure Plan for THRZ are no longer fit for purpose due to conflicts between the redesigned course and these existing development areas. The Change is necessary to address this, and to ensure that resort development anticipated by the HRZ can be delivered in a manner that facilitates, recognises, is compatible with and complements the course redesign, while ensuring the delivery of a golf resort of the highest standard. In addition, the existing nine-hole "farm" golf course in the southern part of THRZ will be disestablished as it is not well utilised and is costly to maintain. This has provided an opportunity to rethink the resort offering in this area and in this regard to establish other resort activities (residential, residential visitor accommodation and homestay development), while continuing to maintain a low average density of residential development while principally providing temporary visitor accommodation across the resort.

2.3 Options under s32(1)(a)

The duty under s32(1)(a) is to examine the extent to which the objectives of the proposal being evaluated are the *most appropriate way to achieve the purpose of the Act*. In determining whether the objectives of the proposal are the *most appropriate*, it is necessary to compare the objectives to other potential options. In this case there are two high-level options to be examined under s32(1)(a):

- The status quo – retaining the current THRZ Structure Plan and provisions (and hence requiring resource consents to enable the objectives of the proposal);
- Requesting a change to the PDP's Chapters 47 (The Hills Resort Zone), 25 (Earthworks) and 27 (Subdivision and Development), to amend THRZ plan provisions and Structure Plan, to reflect the design changes to the golf course and consequential amendments to the Activity Areas, and to expand the land area available for residential development in the southern part of THRZ due to the disestablishment of the 9-hole Farm golf course.

These options are examined below.

2.4 Examination of the options

Status quo

The status quo will retain the current THRZ plan provisions and Structure Plan. This option has the advantage of not requiring a private plan change, thereby avoiding the transaction costs of that process, but it presents the following disadvantages:

- (a) Development of the redesigned golf course would result in unanticipated activities within the various Activity Areas across the Structure Plan area and would require ad-hoc and piecemeal non-complying activity resource consents;

¹ "Objectives" in this context are the goals or purposes of the plan change (as opposed to a formal objective in the planning instrument's provisions under s75(1)(a) of the Act)

- (b) It would impose transaction costs for non-complying activity applications, and the uncertainty that such applications may not be granted; and
- (c) Resource consents would require detailed design work to be undertaken and could lapse within 5 years if not implemented, which is not well suited to longer term master planning and rollout.

On the basis of (a), (b) and (c) above, the existing Structure Plan would not serve the objectives of the proposal and would lead to inefficient use of the resources of THRZ, and hence would not be the most appropriate way to achieve the higher order provisions of the PDP or to achieve the purpose of the Act.

Plan change request

Requesting a change to the PDP's Chapters 47, 25 and 27 to change THRZ provisions and Structure Plan will have the disadvantage of the transactional costs of a private plan change, but has the following advantages:

- (a) It will avoid the multiple processes required for non-complying activity resource consents, and associated transaction costs;
- (b) It enables integrated planning for the entire zone on a comprehensive basis;
- (c) It provides certainty for the entire zoned development at the outset, which will assist with development planning and funding;
- (d) It will enable a more efficient, and superior, layout of golf course and resort facilities; and
- (e) It will not cause adverse effects on the environment that cannot be appropriately avoided, remedied or mitigated, as discussed in the reports submitted in support of this request, including for landscape² and geotechnical³, and in the assessment of effects on the environment ([DOCUMENT 3](#)).

2.5 Summary

On the basis of the examination in Part 2.4 above, the objectives of the proposal – to deliver a world class golfing experience and golf resort with resort accommodation and facilities centred around a redesigned championship golf course of international ranking and world renown – are best achieved by way of a plan change request to the PDP and this is the most appropriate way to achieve the purpose of the Act. The Change achieves the sustainable management purpose of the Act by enabling appropriate activities and development, and accordingly social and economic well-being, in a manner that: sustains the potential of the natural and physical resources of the site and the wider Wakatipu Basin, for future generations; will continue to safeguard the life-supporting capacity of air, water, soil, and ecosystems; and will avoid or mitigate potential adverse effects including effects on landscape and visual amenity values.

3. Sections 32(1)(b) and 32(1)(c): examining the provisions of the proposal in achieving the objectives

² Landscape Assessment Report prepared by Boffa Miskell, dated 8 October 2024

³ Geotechnical Addendum prepared by Geotago, dated 17 October 2024

The duty under s32(1)(b) is to examine whether the provisions of the proposal are the most appropriate way to achieve the objectives, by identifying other reasonably practicable options for achieving the objectives and assessing the efficiency and effectiveness of the provisions in achieving the objectives.

Under s32(1)(c), the costs and benefits of the environmental, economic, social and cultural effects anticipated from implementation of the provisions must be identified and assessed.

These evaluations are set out below.

3.1 Provisions of the proposal

The provisions of the proposal are set out in the tracked change version of THRZ provisions at **DOCUMENT 2** and consequential amendments to Chapters 25 and 27. In summary the changes are:

- (a) Amend Chapter 47.1 of the PDP (THRZ Zone Purpose) as follows:
 - (i) Amend Section 47.1.2 Activity Areas to:
 - a. Include descriptions for the new Golf Training Facility (**GTF**), Sports Courts and Gardens (**SCG**) and Helipad (**H**) Activity Areas, and include minor updates to descriptions or names of other Activity Areas;
 - b. Delete the description for the Driving Range Activity Area and Activity Area A7, which have been removed from the Structure Plan;
 - c. Update the description of the Home Sites Activity Areas to include reference to the additional 10 new Home Site Activity Areas;
 - d. Include reference to visitor accommodation activity within the Clubhouse Activity Area;
 - e. Delete the reference to residential activity within the description for Activity Areas A3 and A6;
 - f. Include reference to residential activity within the description for Activity Areas A5 and A10;
 - g. Update the size descriptions of Activity Areas A1, A2, A4, A5, A6, A10, A11 and the Home Sites;
 - (ii) Include new Section 47.1.5 Structural Planting Framework to describe the role of the proposed Structural Planting Areas (**SPAs**) and include reference to these areas in Sections 47.1.1 and 47.1.2;
- (b) Amend Chapter 47.2 of the PDP (THRZ objectives and policies) as follows (amended text underlined for additions and ~~struck-through~~ for deletions):
 - (i) Amend Policy 47.2.1.4 to include reference to a connection between Hogans Gully Road and McDonnell Road as follows:

47.2.1.4 Require the provision of walkway and cycleway access through the Zone that connects Hogans Gully Road and McDonnell Road in the locations generally

shown on the Structure Plan contained in Section 47.7.

- (ii) Amend Policy 47.2.1.5 to include reference to the Golf Training Facility Activity Area:

47.2.1.5 Provide for commercial activities within the Clubhouse Activity Area and the Golf Training Facility Activity Area that complement and are necessary to the functioning of the Resort, café, restaurants and licensed premises in Activity Area 9, and elsewhere across the Zone as part of the Visitor Accommodation amenities.

- (iii) Amend Policy 47.2.1.8 to delete reference to the Clubhouse Activity Area and Activity Areas A5 and A10, and add reference to A3 and A6 as follows:

47.2.1.8 Avoid the establishment of Residential Units in Activity Areas A1, ~~A5~~ and ~~A10~~ and the Clubhouse Activity Area.

- (iv) Include a new Policy 47.2.1.13 for the new Sports Courts and Gardens Activity Area as follows:

47.2.1.13 Provide for Recreational and Commercial Recreational Activities and buildings, and ancillary structures and activities, for the use by visitors and residents of the Zone, in the Sports Courts and Gardens Activity Area.

- (iii) Include reference to SPAs in Policy 47.2.1.14 (b) as follows:

47.2.1.14 Maintain the landscape character and visual amenity values of the Zone, including the values described in 47.1.3, by:

a. ...

b. Requiring the establishment of Landscape Amenity Management Areas (LAMAs) and Structural Planting Areas (SPAs) in accordance with the Structure Plan in Section 47.7 to ensure that the potential adverse effects of built form are avoided or mitigated, and to contribute to the amenity of the Zone; and

- (c) Amend Chapter 47.4 of the PDP (THRZ activity rules) as follows:

- (i) Amend Rule 47.4.1 to include reference to the requirement to establish connection between Hogans Gully Road and McDonnell Road, remove the requirement for strict compliance with the Structure Plan location, and add an additional matter of control;
- (ii) Amend Rule 47.4.3 to delete Matters of Control (b) and (c) and add a new note to Matter of Control (d);
- (iii) Include new Rule 47.4.3A to require Controlled Activity consent for the establishment of any SPA identified on the Structure Plan;
- (iv) Amend Rule 47.4.4 to include reference to SPAs (if applicable) and new Rule 47.4.3A;
- (v) Consequential amendments to Rules 47.4.4, 47.4.5 and 47.4.11 to include reference to new Activity Areas GTF, SCG and HS6-16 and delete reference to Activity Area A7;
- (vi) Amend Rule 47.4.6 to include buildings for toilet facilities within Activity Area G as a Permitted Activity;

- (vii) Include new Rule 47.4.6A to provide for specific buildings within Activity Area SCG (pergolas and pavilions for shelter and amenity; toilet facilities, greenhouses, café/restaurant and structures ancillary to recreational facilities) as a Permitted Activity;
 - (viii) Amendments to Rules 47.4.9 to 47.4.15 to update references to Activity Areas to reflect: the deletion of A7 from the Structure Plan; the removal of residential activity from A3 and A6; the addition of residential activity to A5 and A10; the addition of visitor accommodation activity to Activity Area C and HS1; and the removal of the requirement to retain Activity Areas S1 and S2 in the same ownership;
 - (ix) Amendments to Rules 47.4.17 to 47.4.20 to update references to reflect the new Activity Areas SCG and GTF;
 - (x) Deletion of Non-Complying Rules 47.4.5, 47.4.7, 47.4.22, 47.4.27 and 47.4.32;
- (d) Amend Chapter 47.5 of the PDP (THRZ activity standards) as follows:
- (i) Amend Standard 47.5.2 (Provision of walkway / cycleway) to describe the location of the walkway / cycleway on the Structure Plan as indicative;
 - (ii) Amend Standard 47.5.3 (Maximum Height – all Activity Areas except Activity Areas 4 and 5) to update the existing heights for Activity Areas A1, A6, A10 and A11; delete the reference to Activity Area A7; and add new height standards for Activity Areas HS6-HS15, GTF and SCG;
 - (iii) Amend Standard 47.5.5 (Maximum Height –Activity Areas 4 and 5) to update the existing height for Activity Areas A5;
 - (iv) Amend Standard 47.5.8 (Building Coverage – Homesites) to add coverage standards for Activity Areas HS6-HS15;
 - (v) Amend Standard 47.5.9 to update references to Activity Areas to reflect the new Helipad Activity Area and the removal of helicopter landings and take-offs from the Clubhouse Activity Area;
 - (vi) Amend Standard 47.5.10 (Building Coverage – Areas A1, A2, A3, A6, A7, A8, A9, A1, S1 and S2) to: delete reference to Activity Area A7; include reference to and add building coverages for Activity Areas GTF, SCG and C; and amend the building coverage for Activity Areas A1, A2 and A9;
 - (vii) Include new Standard 47.5.14A (Buildings in Activity Area SCG) as follows:

Buildings in Activity Area SCG

- a. Buildings in Activity Area SCG shall be limited to:
 - i. pergolas and pavilions for shelter and amenity
 - ii. toilet facilities
 - iii. greenhouses
 - iv. café / restaurant
 - v. any structure ancillary to the recreational facilities, including fences
- b. The maximum gross floor area of any building shall be 200m².

with a breach to be a Discretionary Activity.

- (viii) Amend Standard 47.5.17 (Residential Activity within Visitor Accommodation units) to delete reference to Activity Area A7;
- (ix) Amend Standard 47.5.18 (Residential Density in Activity Areas HS1-HS5) to include reference to new Activity Areas HS6-HS15;
- (x) Amend Standard 47.5.20 (Retail Sales) to include reference to new Activity Area GTF;
- (xi) Include new Standard 47.5.22 (Planting) as follows:

Planting

a. Within any LAMA established in relation to HS6 to HS15, all plantings shall be from the species identified in the Hills Resort Zone Plant List contained at Section 47.9.

b. Within any SPA, all plantings shall be from the species identified in the Hills Resort Zone Plant List contained at Section 47.9.

With any breach to be a Restricted Discretionary Activity with discretion restricted to the effects on landscape character.

- (e) Amend THRZ Structure Plan included at Section 47.7 to:
 - (i) Delete Activity Areas A7 and DR;
 - (ii) Add new Activity Areas H, SCG and GTF;
 - (iii) Add new Activity Areas HS6-HS15 with associated LAMAs;
 - (iv) Add new SPAs;
 - (v) Amend the size, extent and / or location of Activity Area 1, 2, 4, 5, 6, 10, and 11;
 - (vi) Amend the indicative location of the future cycle / pedestrian trail;
 - (vii) Add two new vehicle accesses: one on McDonnell Road to enable a separate access for construction vehicles during development of the resort and for delivery, maintenance and staff vehicles during operation of the resort; and one on Hogans Gully Road to provide access from Hogans Gully Road to HS9-14;
- (f) Amend the Indicative LAMA Plans included at Section 47.8 to reflect the changes to the Structure Plan;
- (g) Include a new Section 47.9 Hills Resort Zone Plant List;
- (h) Amend general typographical and drafting errors in Chapter 47;
- (i) Consequential amendments to District Wide chapters:
 - (i) Amend Table 25.2 in Chapter 25 (Earthworks) to provide for the new Activity Areas HS6-15 and SPAs;
 - (ii) Amend Rules 27.7.22.1, 27.7.23 and 27.7.24 in Chapter 27 (Subdivision and Development) to remove references to Activity Area A7 and include reference to HS6-15;

- (iii) Amend Rule 27.7.22.1 to include reference to Activity Areas C, G, GTF and SCG and a consequential amendment to matter of control (c) to refer to any LAMA;
- (iv) Amend Rule 27.7.22.1 to delete the requirement in matter of control (d) for planting to be physically completed for a minimum of six months to meet the definition of “established”;
- (v) Amend Rule 27.7.22.1 to delete matter of control (e) relating to staging of Activity Area 4;
- (vi) Amend Rule 27.7.22.1 to include reference to SPAs in matter of control (d) and (f) and include a new matter of control (g) to enable Council oversight of the establishment and effectiveness of any SPA;
- (vii) Amend Rules 27.7.22.1, 27.7.22.2, 27.7.23 and 27.7.24 to fix typographical and cross-referencing errors;
- (viii) Include the amended THRZ Structure Plan at Section 27.13.16.

Table 2 below sets out a high-level overview of the evaluation required under section 32(1)(b) (appropriateness, efficiency and effectiveness of the provisions for achieving the objectives, and identifying other reasonably practicable options for achieving the objectives); and the evaluation required under section 32(2)(a) (costs and benefits of the provisions).

Table 2: Evaluation of provisions

Plan Provisions	
New Activity Areas – H, GTF, SCG	
The plan change proposes the following amendments relating to new Activity Areas H, GTF, and SCG:	
Provisions	
<ul style="list-style-type: none"> New descriptions of these Activity Areas in the Chapter 47 Zone Purpose (Section 47.1.2): <ul style="list-style-type: none"> 47.1.2 <i>Activity Areas</i> ... <u><i>b. Golf Training Facility (GTF) – to provide for the operation of golf training services and associated activities (0.4ha);</i></u> ... <u><i>r. Sports Courts and Gardens (SCG) – to provide for recreation activities for use by visitors and residents, including playing surfaces and courts, communal outdoor living and open spaces, and related activities (0.6ha);</i></u> <u><i>s. Helipad (H) – to provide for limited helicopter landings in proximity to key resort activities.</i></u> An amendment to Policy 47.2.1.5 to include Activity Area GTF: <ul style="list-style-type: none"> 47.2.1.5 <i>Provide for commercial activities within the Clubhouse Activity Area <u>and the Golf Training Facility Activity Area</u> that complement and are necessary to the functioning of the Resort, café, restaurants and licensed premises in Activity Area 9, and elsewhere across the Zone as part of the Visitor Accommodation amenities.</i> A new policy in Chapter 47: <ul style="list-style-type: none"> <u>47.2.1.13 <i>Provide for Recreational and Commercial Recreational Activities and buildings, and ancillary structures and activities, for use by visitors and residents of the Zone, in the Sports Courts and Gardens Activity Area.</i></u> An amendment to Rule 47.4.4 to include reference to Activity Areas GTF and SCG to provide for buildings as a Controlled Activity: <ul style="list-style-type: none"> 47.4.4 <i>Buildings (other than outdoor art installations and sculptures) in Activity Areas A1 — A10, A11, HS1 — HS515, S1 — S2, C, <u>GTF and SCG</u> and DR and where in the case of any buildings within any of the Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, <u>SCG</u>, HS3, <u>HS6-15</u>, S1 and S2 the relevant LAMA...</i> An amendment to Rule 47.4.16 to include reference to Activity Areas GTF and SCG to ensure residential activity in these areas is a Non-Complying Activity: <ul style="list-style-type: none"> 47.4.16 <i>Residential Activity in Activity Areas S1 and S2 (excluding staff accommodation), <u>G, C, GTF and SCG</u> and DR</i> 	

- Amendment to Rules 47.4.17, 47.4.18 and 47.4.19 to include reference to Activity Area GTF and/or SCG to enable Retail Sales, Restaurants and Licensed Premises as a Permitted Activity:
 - 47.4.17 *Retail Sales in Activity Areas A1, A5, A10, HS1, GTF and C*
 - 47.4.18 *Restaurants in Activity Area A9, SCG and C*
 - 47.4.19 *Licensed Premises in Activity Areas A1, A5, A9, A10, HS1, GTF, SCG and C*
- An amendment to Rule 47.4.20 to include reference to Activity Area GTF to enable commercial activities associated with the resort as a Permitted Activity:
 - 47.4.20 *Golf clubhouse(s), health and beauty spas, gymnasiums, theatres, pools and conference facilities, indoor and outdoor entertainment, including ancillary office and administration activities in Activity Areas C and GTF*
- An amendment to Rule 47.4.35 to include reference to Activity Area H to enable informal airports as a Permitted Activity:
 - 47.4.35 *Informal airports limited to helicopters within Activity Area ⊖ H and HS1.*
- Amendments to Standard 47.5.3 to include maximum heights for buildings in Activity Areas SCG and GTF:
 - 47.5.3 *Maximum Height - all Activity Areas except Activity Areas 4 and 5*
No building shall protrude through the RL listed below and shall be no higher than the height listed below:

bb. Activity Area GTF RL416.5masl – 6.5m
 ...
ee. Activity Area SCG RL406.0masl – 7m
- An amendment to Standard 47.5.9 to include reference to Activity Area H:
 - 47.5.9 *Informal Airports limited to helicopters within Activity Area ⊖ H and HS1*
 ...
Note: this standard does not apply to informal airports for emergency landings, rescues and firefighting in Activity Area ⊖ H and HS1
- Amendments to Standard 47.5.10 to include maximum building coverage in Activity Areas SCG and GTF:
 - 47.5.10 *Building Coverage — Activity Areas A1, A2, A3, A6, ~~A7~~, A8, A9, A10, A11, S1, and S2, GTF, SCG, and C*
The maximum building coverage, as a percentage of the Activity Area shall be as set out below:

e. GTF 22.5%
f. SCG 22.5%
 ...

- A new Standard 47.5.14A limiting the types of buildings enabled in Activity Area SCG and imposing a maximum gross floor area on any building, with a breach being a Discretionary Activity, as follows:
 - 47.5.14A Buildings in Activity Area SCG
 - a. Buildings in Activity Area SCG shall be limited to:
 - i. pergolas and pavilions for shelter and amenity
 - ii. toilet facilities
 - iii. greenhouses
 - iv. café / restaurant
 - v. any structure ancillary to the recreational facilities, including fences
 - b. The maximum gross floor area of any building shall be 200m².
 - An amendment to Standard 47.5.20, relating to Retail Sales, to include reference to Activity Area GTF as follows:
 - 47.5.20 Retail sales
Goods or services displayed, sold or offered for sale within the Zone shall be limited to:...
 - c. Within Activity Area C and GTF, in addition to a. and b above, goods and services associated with, and ancillary to the permitted or approved activities;...
 - Consequential amendments to Chapter 27 (Subdivision and Development) Rule 27.7.22.1 to include reference to Activity Areas GTF and SCG as follows:
 - 27.7.22.1 Subdivision comprising all of any part of Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, A11, S1, S2, and HS1 - HS15, C, G, GTF and SCG:...
- Structure Plan**
- Three additional Activity Areas delineated on the Structure Plan, with an associated new LAMA for Activity Area SCG

Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
By permitting development within Activity Areas GTF and SCG, there is the potential for adverse landscape effects to arise, however these are mitigated	The key benefit of the Change is regulatory efficiency, by reducing reliance on more complex resource consent processes as a result of the development	The proposed provisions are the most appropriate, effective and efficient way to achieve the objective of the proposal and Objective 47.2.1, as they utilise the existing format and structure of THRZ (identification of development areas on the Structure Plan with associated rules) to ensure

<p>through the locating of Activity Area GTF within an existing Activity Area (which has already been assessed as appropriate for development) and the imposition of rules and standards for the GTF and SCG to ensure built form appropriately responds to the landscape. No built form is anticipated or provided for within Activity Area H.</p>	<p>not being anticipated by either the existing Structure Plan or the provisions.</p> <p>The Change will result in a social benefit to users of the resort by providing for additional recreational activities and facilities that are consistent with the core purpose of the resort zone.</p> <p>The key benefit of new Activity Area H is the relocation of the helipad to a close by but less intrusive location (for resort users) while freeing up land with Activity Area C for visitor accommodation activities, which is also a core purpose of the resort zone.</p>	<p>that golf resort development is managed and undertaken in an integrated way.</p> <p>The proposed provisions, including the modifications to THRZ Structure Plan and the addition of Activity Areas to specifically apply to the area for additional activities, will be effective in achieving the objectives of the proposal because they will allow subdivision and development to proceed in the expected manner under the existing THRZ provisions.</p> <p>The provision of buildings within Activity Area SCG as a Controlled Activity, subject to controls on maximum building size, building coverage and building types, is an efficient method of enabling small scale development (noting that the maximum building coverage only enables a total of 400m² of built form within the Activity Area) directly associated with the purpose of the Activity Area. The addition of a LAMA for this area, and the existing Rule 47.4.3 which requires a Controlled Activity consent to establish a LAMA, will ensure effects on landscape character and visual amenity are appropriately managed.</p> <p>The activities provided for within each new Activity Area are onsite visitor activities which form part of the overall resort offering and consistent with Objective 47.2.1 and the PDP definition of "Resort".</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>
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Provisions

<p>New Activity Areas – Homesites</p> <p>The plan change proposes the following amendments relating to new Homesites (HS) 6 - 15:</p> <p>Provisions</p> <ul style="list-style-type: none"> • An amendment to Chapter 47 Zone Purpose (Section 47.1.2) to include reference to the new Homesites: <ul style="list-style-type: none"> 47.1.2 <i>Activity Areas</i> ... q. <i>Home Sites (HS2 - HS515) — to provide for residential activity...</i> • Amendments to Rules 47.4.4, 47.4.5, 47.4.11, 47.4.14 and 47.4.15 to include reference to the new Homesites: <ul style="list-style-type: none"> 47.4.4 <i>Buildings (other than outdoor art installations and sculptures) in Activity Areas A1 — A10, A11, HS1 — HS515, S1 — S2, C, GTF and SCG and</i>

~~DR~~ and where in the case of any buildings within any of the Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, HS3, HS6-15, S1 and S2...

In addition to a. to g. above, where buildings are proposed within any of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, SCG, HS3, HS6-15, S1 and S2:...

Note: Future applications for buildings in Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, HS3, HS6-15, S1 and S2 may rely on...

- 47.4.5 Buildings within any of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, HS3, HS6-15, S1 and S2 where the relevant...
- 47.4.11 Residential Activity in Activity Areas A2, ~~A3~~, A4, A5, ~~A6~~, ~~A7~~, A8, A9, A10, A11 and HS1— HS515
- 47.4.14 Residential Visitor Accommodation (unlimited duration) in Activity Areas A2, ~~A3~~, A4, A5, ~~A6~~, ~~A7~~, A8, A9, A10, A11, HS1 — HS515
- 47.4.15 Homestays in Activity Areas A2, ~~A3~~, A4, A5, ~~A6~~, ~~A7~~, A8, A9, A10, A11, HS1 — HS515

- Amendments to Standard 47.5.3 to include reference to the new Homesites and provision of maximum heights for these areas:

47.5.3 Maximum Height - all Activity Areas except Activity Areas 4 and 5

No building shall protrude through the RL listed below and shall be no higher than the height listed below:

...

- p. Activity Area HS6 RL436.5 masl – 6.5m
- q. Activity Area HS7 RL430.5 masl – 6.5m
- r. Activity Area HS8 RL432.5 masl – 6.5m
- s. Activity Area HS9 RL402.5 masl – 6.5m
- t. Activity Area HS10 RL405.5 masl – 6.5m
- u. Activity Area HS11 RL421.25 masl – 6.5m
- v. Activity Area HS12 RL410.5 masl – 6.5m
- w. Activity Area HS13 RL417.0 masl – 6.5m
- x. Activity Area HS14 RL411.5 masl – 6.5m
- y. Activity Area HS15 RL377.5 masl – 6.5m

...

- Amendments to Standard 47.5.8 to include reference to the new Homesites and provision of maximum building coverage for these areas:

47.5.8 Building Coverage — Homesites

The maximum building coverage, as a percentage of the area of the Activity Area shall be:

- | | | |
|----|--|------------|
| a. | HS1 | 35% |
| b. | HS2 — <u>HS5</u> , <u>HS14</u> - <u>HS15</u> | <u>25%</u> |
| c. | <u>HS6 and HS8</u> | <u>50%</u> |
| d. | <u>HS7</u> | <u>32%</u> |
| e. | <u>HS9 – HS13</u> | <u>38%</u> |

- An amendment to Standard 47.5.18 to include reference to the new Homesites:
47.5.18 Residential Density in Activity Areas HS1 — ~~HS15~~
The maximum number of Residential Units per Home Site in HS1 — ~~HS15~~ shall be 1.
- Consequential amendments to Chapter 27 (Subdivision and Development) Rule 27.7.22.1 to include reference to the new Homesites:
27.7.22.1 Subdivision comprising all ofr any part of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, A11, S1, S2, ~~and HS1 - HS15, C, G, GTF and SCG:...~~
- Consequential amendments to Chapter 27 (Subdivision and Development) Rules 27.7.23 and 27.7.24 to include reference to the new Homesites:
27.7.23 Subdivision comprising all ofr any part of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, HS3, ~~HS6-15~~, S1 and S2 where the LAMA in proximity to the Activity Area has not been established in accordance with Rule 47.4.3, or is not proposed through subdivision.
27.7.24 Subdivision comprising all ofr any part of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, HS3, ~~HS6-15~~, S1 and S2 where the application is not accompanied by the information required by Rule 27.7.~~4522~~.1 (if applicable).
- Consequential amendments to Chapter 25 (Earthworks) Rule 25.5.10B.1 to include reference to the new Homesites:

25.5.10B.1	<i>Table 25.2 – Maximum Volume</i>	<i>Maximum Total Volume</i>
	<i>Activity Areas HS1 – HS153, HS6 — HS7</i>	<i>500m³ per home site</i>

Structure Plan

- Ten additional Homesites delineated on the Structure Plan, with associated new LAMAs

Evaluation

Costs	Benefits	Efficiency and effectiveness, appropriateness
<p>By enabling development within the southern portion of THRZ, there is the potential for adverse landscape effects to arise, however these are mitigated through the sensitive locating of the Homesites, the application of LAMAs and Structural Planting Areas (see below for assessment of these), and the impositions of rules and standards to ensure built form appropriately responds to the landscape.</p> <p>There will be an economic cost to the</p>	<p>The key benefit of the Change is regulatory efficiency, by reducing reliance on more complex resource consent processes as a result of the development not being anticipated by either the existing Structure Plan or the provisions.</p> <p>The Change may result in a small social benefit to the community through a small additional provision of this type of residential housing.</p> <p>The Change will result in increased</p>	<p>The proposed provisions are the most appropriate, effective and efficient way to achieve the objective of the proposal and Objective 47.2.1, as they utilise the existing format and structure of THRZ (identification of development areas on the Structure Plan with associated rules) to ensure that golf resort development is managed and undertaken in an integrated way.</p> <p>The proposed provisions, including the modifications to THRZ Structure Plan and the addition of new Homesites, will be effective in achieving the objectives of the proposal because they will allow subdivision and development to proceed in the expected manner under the existing THRZ provisions.</p>

<p>developer of THRZ of a potentially more lengthy and uncertain consent process (for a Non-Complying Activity) in the event the Structural Planting Areas (see below) are not established prior to building.</p>	<p>biodiversity values arising from the requirement to undertake indigenous planting within the new Structural Planting Areas prior to development the new Homesites.</p>	<p>The provision of buildings within the new Homesites as a Controlled Activity, subject to controls on building coverage, building heights, building materials and lightspill, is an efficient method of enabling development while responding to the sensitivities of the site. The addition of LAMAs for these areas, and the inclusion of the new Structural Planting Areas (see below for assessment of these) to further integrate development (and the existing Rule 47.4.3 and new Rule 47.4.3A which require a Controlled Activity consent, respectively, to establish a LAMA and Structural Planting Areas) will ensure effects on landscape character and visual amenity are appropriately managed.</p> <p>The limited number of new Homesites, and the retention of the existing cap on the overall number of residential units within THRZ, are consistent with Objective 47.2.1 and the definition of “Resort”.</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>
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Provisions

Vehicle access and walking / cycle trail

The plan change proposes the following amendments relating to vehicle access and the walking / cycle trail:

Provisions

- An amendment to Policy 47.2.1.4 to include reference to Hogans Gully and McDonnell Roads:
 - 47.2.1.4 *Require the provision of walkway and cycleway access through the Zone that connects Hogans Gully Road and McDonnell Road in the locations generally shown on the Structure Plan contained in Section 47.7.*
- Amendments to Rule 47.4.1 to include reference to Hogans Gully and McDonnell Roads, remove the requirement for strict compliance with the Structure Plan location, and add an additional matter of control:
 - 47.4.1 *Access, and the walkway/cycleway connecting Hogans Gully Road and McDonnell Road, as indicatively shown on the Structure Plan in Section 47.7(1-30m).*
 - Control is reserved to:*
 - ...
 - e. For the walkway/cycleway, any legal mechanisms necessary to ensure continuous access is provided across, and formation of the trail occurs within, Lot 2 DP 392663*
- An amendment to Rule 47.5.2 to remove the requirement for strict compliance with the Structure Plan location:

<p>47.5.2 <i>Provision of walkway / cycleway</i></p> <p><i>No more than 40 Units (visitor accommodation or residential) in the Zone shall be constructed prior to construction of the walkway/cycleway in the location <u>indicatively</u> shown on the Structure Plan.</i></p> <p>Structure Plan</p> <ul style="list-style-type: none"> • Two additional vehicle accesses delineated on the Structure Plan, one on McDonnell Road and one on Hogans Gully Road • An amendment to the location of the indicative walking / cycle trail as delineated on the Structure Plan 		
Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
<p>There are no costs associated with the removal of strict compliance with the location of the walkway / cycleway as shown on the Structure Plan. The retention of standards ensures trail development / formation appropriately responds to the landscape.</p> <p>There are no costs associated with the additional vehicle accesses to the Structure Plan, as rules and standards will be retained to ensure adverse visual/landscape effects are avoided, and as the capacity of THRZ is not changing there will be no increase in traffic movements to and from the zone.</p>	<p>The key benefit of the Change is regulatory efficiency, by reducing reliance on more complex resource consent processes as a result of the development not being anticipated by either the existing Structure Plan or the provisions.</p> <p>The Change provides greater flexibility for locating the cycleway / walkway including on a route that is more rideable/walkable, while still ensuring the key outcome (the connection between Hogans Gully Road and McDonnell Road) is achieved, and by providing Council oversight regarding the possible integration of non-THRZ land (the adjacent Wakatipu Basin Lifestyle Precinct zoned Lot 2 DP 392663, also owned by the Requestor) within the trail network.</p> <p>The addition of two new vehicles accesses to the Structure Plan may result in a small economic and environmental benefit through providing more direct access to particular parts of THRZ and therefore</p>	<p>The proposed provisions are the most appropriate, effective and efficient way to achieve the objective of the proposal and Objective 47.2.1, as they utilise the existing format and structure of THRZ to ensure that the golf resort development is managed and undertaken in an integrated way.</p> <p>The proposed provisions, including the modifications to THRZ Structure Plan, will be effective in achieving the objectives of the proposal because they will allow development to proceed in the expected manner under the existing THRZ provisions, while enabling greater flexibility to respond to onsite conditions.</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>

	reducing internal vehicle movements within THRZ.	
Provisions		
Structural Planting Framework / Areas		
The plan change proposes the following additions relating to Structural Planting Framework / Areas:		
Provisions		
<ul style="list-style-type: none"> • An amendment to Chapter 47 Zone Purpose (Section 47.1.1) to include reference to the new Structural Planting Areas: <i>47.1.1 The purpose of the Zone is to... <u>Structural Planting Areas (SPA) will, along with the LAMA, further integrate built development into the landscape and the wider resort while enhancing ecological values.</u></i> • An amendment to Chapter 47 Zone Purpose description of Activity Areas (Section 47.1.2) to include reference to the new Structural Planting Areas: <i>47.1.2 Activity Areas The Hills Resort Zone Structure Plan... The Structure Plan also identifies Landscape Amenity Management Areas, including existing vegetation to be retained in perpetuity; <u>Structural Planting Areas proposed for native revegetation; walking / cycling trail; and main vehicle accessways into and through the Zone.</u></i> • An amendment to Chapter 47 Zone Purpose to include a new Section 47.1.5 to provide a description of the new Structural Planting Framework: <i>47.1.5 <u>Structural Planting Framework</u> <u>Structural Planting Areas (SPAs) are identified on the Structure Plan and are located around Activity Areas HS6 to HS15. The SPAs work in conjunction with the LAMAs for these Activity Areas and comprise areas where planting is required to ensure a homogenous appearance of vegetation that visually connects the Activity Areas and integrates built development into the landscape. The SPAs do not provide a screening purpose but support the visual context for built development within this part of the Zone, and will enhance ecological values.</u> <u>The Zone provisions require that the SPAs be established prior to the construction of buildings within Activity Areas HS6 to HS15.</u> <u>The planting of SPAs follows the hummocky terrain landform in this southern area of the Zone, with tree planting in the gullies and shrubland species along steeper escarpments. The species for planting are limited to those indigenous species included at Section 47.9.</u></i> • An amendment to limb (b) of Policy 47.2.1.13 (proposed to be renumbered to 47.2.1.14) to include reference to the new Structural Planting Areas: <i>47.2.1.14 Maintain the landscape character and visual amenity values of the Zone, including the values described in 47.1.3, by: ... b. Requiring the establishment of Landscape Amenity Management Areas (LAMAs) and Structural Planting Areas (SPAs) in accordance with the Structure Plan in Section 47.7 to ensure that the potential adverse effects of built form are avoided or mitigated, and to contribute to the amenity of the Zone...</i> • A new rule in Chapter 47 to provide for the establishment of any Structural Planting Area (SPA) identified on the Structure Plan as a Controlled Activity: <i>47.4.3A <u>Structural Planting Areas (SPA)</u></i> 		

The establishment of any SPA identified on the Structure Plan.

Control is reserved to:

- a. The effectiveness of the SPA proposed, in terms of its contribution to visual coherence and amenity, whether it ensures integration when viewed from public viewpoints outside the Zone, including:
 - i. the extent to which any existing vegetation should be retained;
 - ii. the species mix, proposed density and location of any new vegetation and its size at planting and maturity;
 - iii. ongoing maintenance requirements and obligations, including the replacement of any diseased, damaged, dead or dying plants; and
 - iv. irrigation methods.
- b. The mechanisms (including registration of legal instruments, as appropriate) to ensure that:
 - i. The SPA will be completed prior to construction of any buildings in any of Activity Areas HS6 to HS15, and that
 - ii. Ongoing commitments exist in relation to the maintenance and management of the SPA, including through a landscape management strategy;
 - iii. Ongoing monitoring requirements.

Note: For the purpose of this matter of control, "completed" means that the works required, including all planting, irrigation installation, and any earthworks:

- i. are implemented and physically completed; and
- ii. have been audited by the Council no sooner than 6 months following physical completion; and
- iii. have been certified by the Council as being completed.

Note: this rule does not apply where the SPA has been established under Rule 27.7.22.1

- An amendment to Rule 47.4.4 to include reference to the new Structural Planting Areas and new Rule 47.4.3A:
 - 47.4.4 Buildings (other than outdoor art installations and sculptures) in Activity Areas A1 — A10, A11, HS1 — ~~HS515~~, S1 — S2, C, ~~GTF~~ and ~~SCG~~ and ~~DR~~ and where in the case of any buildings within any of the Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, ~~SCG~~, HS3, ~~HS6-15~~, S1 and S2 the relevant LAMA and SPA (if applicable) in proximity to the Activity Area has been established in accordance with a resource consent granted under Rules 47.4.3 and 47.4.3A and 27.7.22.
 - ...
 - Note: Future applications for buildings in Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, ~~SCG~~, HS3, ~~HS6-15~~, S1 and S2 may rely on the LAMA or SPA (if applicable) that has been established as part of any prior application under either this rule, Rule 47.4.3, 47.4.3A or a subdivision consent pursuant to Rule 27.7.22
- A new standard in Chapter 47 to require plants within Structural Planting Areas and new Homesite LAMAs to be from a specified list, with a breach to be a Restricted Discretionary Activity with discretion restricted to effects on landscape character:
 - 47.5.22 Planting

a. Within any LAMA established in relation to HS6 to HS15, all plantings shall be from the species identified in the Hills Resort Zone Plant List contained at Section 47.9.

b. Within any SPA, all plantings shall be from the species identified in the Hills Resort Zone Plant List contained at Section 47.9.

- A new Section 47.9 to provide a list of plant species as referenced in new standard 47.5.22
- Consequential amendments to Chapter 27 (Subdivision and Development) Rule 27.7.22.1 to include reference to the new SPAs, and the inclusion of a new matter of control relating to the effectiveness of any SPA:

27.7.22.1 *Subdivision comprising all of any part of Activity Areas A1, A2, A3, A4, A5, ~~A7~~, A8, A9, A10, A11, S1, S2, ~~and~~ HS1 - HS15, C, G, GTF and SCG:...*

d. The approach to establishment of the LAMA or SPA. For these purposes “established” means...

...

f. The mechanisms (including (but not limited to) requirements for the works to be established prior to issue of certification under section 224(c) and registration of any legal instruments on the title(s) of the land to ensure ongoing compliance and monitoring) to ensure that:

- i. Any LAMA or SPA will be established prior to construction of any buildings in any Activity Area;*
- ii. Ongoing commitments exist in relation to the maintenance and management of the LAMA or SPA, including through...*

g. The effectiveness of the SPA, in terms of its contribution to visual coherence and amenity, whether it ensures integration when viewed from public viewpoints outside the Zone, including:

- i. the extent to which any existing vegetation should be retained;*
- ii. the species mix, proposed density and location of any new vegetation and its size at planting and maturity;*
- iii. ongoing maintenance requirements and obligations, including the replacement of any diseased, damaged, dead or dying plants; and*
- iv. irrigation methods;*

- Consequential amendments to Chapter 25 (Earthworks) Rule 25.5.10B.3 to include reference to the new SPAs:

25.5.10B.3	Table 25.2 – Maximum Volume	Maximum Total Volume
	All Activity Areas	500m ³
	Farming activities Golf course development / redevelopment, and earthworks associated with establishment of LAMA and SPA	No limit

Structure Plan

- Two new SPAs delineated on the Structure Plan, associated with HS6-9 and HS10-12

Evaluation		
Costs	Benefits	Efficiency and effectiveness, appropriateness
<p>There will be no landscape cost arising from the Structural Planting Areas themselves, although by enabling development within the southern portion of THRZ, there is the potential for adverse landscape effects to arise. These are mitigated through the use Structural Planting Areas (in addition to LAMAs and built form controls, and the careful location of the HS sites) to provide additional integration in an area previously used as farmland, in a more rugged aesthetic than what is provided for within the LAMAs, when viewed from specific visual catchments.</p> <p>There will be an economic cost to the developer of THRZ to establish the Structural Planting Areas prior to buildings occurring in the relevant Homesites.</p>	<p>The inclusion of the provisions will better protect the landscape’s values experienced in the surrounding area.</p> <p>The Change will result in increased biodiversity values arising from the requirement to undertake indigenous planting within the new Structural Planting Areas prior to development the new Homesites.</p>	<p>The proposed provisions are effective at maintaining the landscape values of this part of THRZ when viewed from beyond the zone and integrating development in this part of THRZ with the remainder of the resort and into the immediate and wider landscape context.</p> <p>The utilisation of a Controlled Activity consent to establish Structural Planting Areas is an efficient method of enabling development while responding to the sensitivities of the site. The new standard requiring a majority of planting within these areas to be from a prescribed list will ensure integration and consistency is achieved across a large area, and effects on landscape character and visual amenity are appropriately managed.</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>
Provisions		
<p>Changes to the location of residential activity and visitor accommodation</p> <p>The plan change proposes the following additions relating to residential activity:</p> <p>Provisions</p> <ul style="list-style-type: none"> • An amendment to Chapter 47 Zone Purpose description of Activity Areas (Section 47.1.2) to update references to where residential activity will occur: <ul style="list-style-type: none"> 47.1.2 <i>Activity Areas</i> <i>The Hills Resort Zone Structure Plan...</i> c. <i>Clubhouse (C) — to provide for a range of commercial activities associated with the use of the golf course and resort, including golf services, restaurant, spa, gymnasium, meeting and conference facilities, <u>visitor accommodation in the Clubhouse Suites</u>, and cellar door facilities (1.0 ha);</i> 		

- ...
- g. ~~Seclusion Flats~~ Millrace Accommodation (A3) — to provide for a range of visitor accommodation ~~and residential activities, in close proximity of the central resort facilities and nestled within a secluded area adjoining a forested grove and traditional millrace, with uninterrupted alpine views~~ (0.4 ha);*
- ...
- i. Terrace Views (A5) — to provide for visitor accommodation and residential activities overlooking ~~between the 14th and 15th fairways, in close proximity to the central resort facilities at the Clubhouse, with 360 degree views of the wider alpine landscape~~ (1.25 ha);*
- j. ~~Fairway Living Accommodation~~ (A6) — to provide for a range of visitor accommodation in close proximity to the central resort facilities at the Clubhouse and residential activities, within a glacial valley featuring schist outcrops adjoining the 14th fairway, with wide views of the surrounding landscape (0.97 ha);*
- ...
- n. ~~Forest Accommodation~~ Fairway Living (A10) — to provide for secluded visitor accommodation and residential activities with sweeping golf course and Coronet Peak views and an established forested backdrop ~~within a private, established forested area~~ (1.25 ha);*
- An amendment to Policy 47.2.1.8 to amend references to Activity Areas to reflect the change in location for residential activity:
47.2.1.8 *Avoid the establishment of Residential Units in Activity Areas A1, ~~A5~~ and ~~A10~~ and the Clubhouse Activity Area.*
 - An amendment to Rule 47.4.9 to provide for visitor accommodation in Activity Area C (Clubhouse):
47.4.9 *Visitor accommodation (excluding staff accommodation) in Activity Areas A1 — A11, C and HS1*
 - An amendment to Rule 47.4.10 to delete the requirement to hold staff accommodation in Activity Areas S1 and S2 within the same ownership as Activity Areas C and G:
47.4.10 *Residential activity limited to staff accommodation in Activity Areas S1 and S2 ~~provided it is maintained in the same ownership as Activity Areas C and G and is not subdivided, unit titled or otherwise separated (including by lease) from the S1 and S2 ownership~~*
 - An amendment to Rule 47.4.11 to update references to Activity Areas where residential activity is a Permitted Activity:
47.4.11 *Residential Activity in Activity Areas A2, ~~A3~~, A4, A5, A6, A7, A8, A9, A10, A11 and HS1— HS515*
 - An amendment to Rule 47.4.12 to update references to Activity Areas where residential units are a Non-Complying Activity:
47.4.12 *Residential Units in Areas A1, ~~A5~~A3 and ~~A10~~A6 and C*
 - An amendment to Rule 47.4.13 to update references to Activity Areas where residential use of visitor accommodation units is a Permitted Activity:
47.4.13 *Residential use of visitor accommodation units in Activity Areas ~~A5~~,A3 and ~~A10~~A6 that complies with Standard 47.5.17*
 - An amendment to Rule 47.4.14 to update references to Activity Areas where Residential Visitor Accommodation is a Permitted Activity:
47.4.14 *Residential Visitor Accommodation (unlimited duration) in Activity Areas A2, ~~A3~~, A4, A5, A6, A7, A8, A9, A10, A11, HS1 — HS515*
 - An amendment to Rule 47.4.15 to update references to Activity Areas where Homestays are a Permitted Activity:
47.4.15 *Homestays in Activity Areas A2, ~~A3~~, A4, A5, A6, A7, A8, A9, A10, A11, HS1 — HS515*

Evaluation

Costs	Benefits	Efficiency and effectiveness, appropriateness
<p>There are no costs associated with these provisions, as the retention of the existing caps on both visitor accommodation and residential units means there will be no change to the capacity of THRZ, and the overall development will continue to meet the terms of the definition of “Resort”.</p>	<p>The key benefit of the Change is regulatory efficiency, by reducing reliance on more complex resource consent processes as a result of the activities proposed not being anticipated by the provisions (even though the effect of the unanticipated activity would be no different to the effect of the anticipated activity).</p> <p>The Change provides greater flexibility of the location of residential and visitor accommodation throughout THRZ and ensures that visitor accommodation is distributed more logically across THRZ and in closer proximity to the central resort facilities.</p>	<p>The proposed provisions are the most appropriate, effective and efficient way to achieve the objective of the proposal and Objective 47.2.1, as they utilise the existing format and structure of THRZ to ensure that golf resort development is managed and undertaken in an integrated way.</p> <p>The proposed provisions continue to ensure that THRZ meets the PDP definition of “Resort” by retaining the existing cap on overall (both visitor accommodation and residential) unit numbers (set at 150 by Rule 47.5.15) and the existing cap on the number of residential units (set at 66 by Rule 47.5.16), meaning that the ratio of residential units to visitor accommodation units (66/150, or 44%) is retained. While the dispersal of residential units throughout THRZ as a result of the Change may be slightly different compared to the operative THRZ, this will not result in an environmental effect and the zone will remain as “principally providing temporary visitor accommodation”, consistent with Objective 47.2.1 and the definition of “Resort”.</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>
<p>Provisions</p>		
<p>Amendments to built form controls and other amendments (including consequential amendments and fixing typographical and drafting errors)</p> <p>The plan change proposes the following changes relating to built form and various other provisions:</p> <p>Provisions</p> <ul style="list-style-type: none"> • An amendment to Chapter 47 Zone Purpose (Section 47.1.3) to fix a typographical error: <ul style="list-style-type: none"> 47.1.3 <i>Landscape Values of the Hills Resort Zone</i> <i>The landscape values of the Zone comprise...</i> <i>Buildings within the Zone are located where they are able to <u>be</u> absorbed...</i> • Amendments to any provisions referencing Activity Area A7 to delete this reference • Amendments to any provisions referencing Activity Area DR to delete this reference • An amendment to Rule 47.4.6 to enable toilet facilities buildings as a Permitted Activity in Activity Area G: <ul style="list-style-type: none"> 47.4.6 <i>Buildings in Activity Area G, <u>limited to:</u></i> 		

- a. golf course shelters
- b. sheds for golf course maintenance purposes
- c. farm buildings
- d. toilet facilities

- Amendments to Rule 47.4.3 to delete the matters of control (b) and (c) and updating matter of control (d):

47.4.3 Landscape Amenity Landscape Area (LAMA)

The establishment of any LAMA identified on the Structure Plan

...

~~b. The approach to establishment of the LAMA. For the purpose of this rule “establishment” means that the works required, including all planting, irrigation installation, and any earthworks:~~

~~i. are implemented and physically completed; and~~

~~ii. have been audited by the Council no sooner than 6 months following physical completion; and~~

~~iii. have been certified by the Council as being completed.~~

~~e. For the purpose of clause b above, Activity Area 4 and LAMA L4 may be established in stages (Sub Areas L4.1, L4.2 and L4.3), as shown on the indicative LAMA design/layout plans in Section 47.8.~~

d. The mechanisms (including registration of legal instruments, as appropriate) to ensure that:

i. Any LAMA will be ~~established~~ completed prior to construction of any buildings in any Activity Areas, and that

ii. Ongoing commitments exist in relation to the maintenance and management of the LAMA, including through a landscape management strategy;

iii. Ongoing monitoring requirements.

Note: For the purpose of this matter of control, “completed” means that the works required, including all planting, irrigation installation, and any earthworks:

i. are implemented and physically completed; and

ii. have been audited by the Council no sooner than 6 months following physical completion; and

iii. have been certified by the Council as being completed.

- Amendments to Rule 47.4.4 to include reference to Rule 27.7.22 and to delete the reference to “established”:

47.4.4 *Buildings (other than outdoor art installations and sculptures) in Activity Areas A1 — A10, A11, HS1 — ~~HS515~~, S1 — S2, C, GTF and SCG ~~and DR~~ and where in the case of any buildings within any of the Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, SCG, HS3, HS6-15, S1 and S2 the relevant LAMA and SPA (if applicable) in proximity to the Activity Area has been established in accordance with a resource consent granted under Rules 47.4.3 and 47.4.3A and 27.7.22...*

- Deletion of Non-Complying Activity Rules 47.4.5, 47.4.7, 47.4.22, 47.4.27 and 47.4.32 and a consequential amendment to Rule 47.4.6:

47.4.5 ~~Buildings within any of Activity Areas A1, A2, A3, A4, A5, A7, A8, A9, A10, HS3, S1 and S2 where the relevant LAMA in proximity to the Activity Area has not been established in accordance with Rule 47.4.3~~ — NG

47.4.6 ~~Buildings in Activity Area G, limited to:...~~

~~47.4.7 Buildings in Activity Area G, except as provided for in Rule 47.4.6 above~~ — NG

~~47.4.22 Service Activities except for those provided for by Rule 47.4.21~~ — NG

~~47.4.27 Mining~~ — NG

~~47.4.32 Industrial Activities except for those provided for by Rule 47.4.30~~ — NG

- An amendment to Rule 47.4.9 to provide for visitor accommodation in Homesite 1:

47.4.9 Visitor accommodation (excluding staff accommodation) in Activity Areas A1 — A11, C and HS1

- Amendments to Standard 47.5.3 to update maximum heights for buildings in Activity Areas whose extents or locations have changed, and to fix typographical errors:

47.5.3 Maximum Height - all Activity Areas except Activity Areas 4 and 5

No building shall protrude through the RL listed below and shall be no higher than the height listed below:

~~Activity Area A1 RL418.5422.0 masl~~ — 8m

Activity Area A1.b RL424.0 masl — 6m

...

~~Activity Area A6 RL419.5 masl~~ — ~~8~~10m

...

~~Activity Area 10 RL406.5410.5 masl~~ — ~~68~~m

~~Activity Area 11 RL408.5410.0 masl~~ — 8m

~~Activity Area HS1 RL419.0 masl~~ — 8m ~~masl~~

- An amendment to Standard 47.5.5 to update maximum heights for buildings in Activity Area A5 which has had a change in extent:

47.5.5 Maximum Height - Activity Areas 4 and 5

No building shall protrude through the RL listed below and shall be no higher than the height listed below:

~~Activity Area A4 RL419.3 masl~~ — 8m

~~Activity Area A5 RL419.5422.0 masl~~ — 8m

- Amendments to Standard 47.5.10 to update maximum building coverage in Activity Areas whose extents or locations have changed:

47.5.10 Building Coverage — Activity Areas A1, A2, A3, A6, A7, A8, A9, A10, A11, S1, and S2, GTF, SCG, and C

The maximum building coverage, as a percentage of the Activity Area shall be as set out below:

a. ~~A1, A9:~~ ~~55~~30%

b. ~~A23~~ — A8, A10, A11, S1 and S2: 40%

- c. A2 29%
- d. A9 38%
- e. ...

- Consequential amendments to Chapter 27 (Subdivision and Development) Rules 27.7.22.1, 27.7.23 and 27.7.24 to fix a typographical error:
 - 27.7.22.1 *Subdivision comprising all ofr any part of Activity Areas...*
 - 27.7.23 *Subdivision comprising all ofr any part of Activity Areas...*
 - 27.7.22.1 *Subdivision comprising all ofr any part of Activity Areas...*
- An amendment to Chapter 27 (Subdivision and Development) Rule 27.7.22.1 to delete the requirement in matter of control (e) for planting to be physically completed for a minimum of six months to meet the definition of “established”:
 - 27.7.22.1 *Subdivision comprising all...*
 - d. *The approach to establishment of the LAMA or SPA. For these purposes “established” means that the works required, including all planting, irrigation installation, and any earthworks:*
 - i. *are implemented and physically completed; and*
 - ii. *have been audited by the Council ~~no sooner than 6 months~~ following physical completion; and*
 - iii. *have been certified by the Council as being completed.*
- A consequential amendment to Chapter 27 (Subdivision and Development) Rule 27.7.22.2 to improve clarity:
 - 27.7.22.2 *Any subdivision ~~wholly within Activity Area G~~ that will create a new site for any visitor accommodation, residential or commercial activity wholly located within Activity Area G.*
- A consequential amendment to Chapter 27 (Subdivision and Development) Rule 27.7.24 to fix a cross-referencing error:
 - 27.7.24 *Subdivision comprising all ...where the application is not accompanied by the information required by Rule 27.7.4522.1 (if applicable).*
- A consequential amendment to Chapter 27 (Subdivision and Development) Section 27.13.16 to replace the existing Structure Plan with the amended Structure Plan.
- A consequential amendment to Chapter 25 (Earthworks) Rule 25.5.10B.1 fix a typographical error:

25.5.10B.1

<i>Table 25.2 – Maximum Volume</i>	<i>Maximum Total Volume</i>
<i>Activity Areas HS1 – HS153, HS6 – HS7</i>	<i>500m³ per home site</i>

Structure Plan

- Amendments to the location and extents of Activity Areas as delineated on the Structure Plan, and consequential updates to the LAMAs associated with these (where applicable)
- Consequential amendments to the Indicative LAMA plans in Section 47.8

Evaluation

Costs	Benefits	Efficiency and effectiveness, appropriateness
<p>By enabling an additional type of built form within Activity Area G (toilet facilities, reflecting that these are a necessary ancillary activity in this area and these exist in a limited form already), there is the potential for adverse landscape effects however these are mitigated through the retention of existing standards relating to built form in this Activity Area.</p> <p>The increases in maximum height for a number of Activity Areas also has a potential for adverse landscape effects, however the effect of these have been mitigated by the continued use of an RL height and the establishment of LAMAs to avoid visibility of built form from beyond the zone.</p> <p>There are no costs associated with fixing typographical and drafting errors.</p>	<p>The key benefit of the Change is regulatory efficiency, by reducing reliance on more complex resource consent processes as a result of the development not being anticipated by either the existing Structure Plan or the provisions, and by also recognising an existing activity.</p> <p>The Change may result in a small social and cultural benefit to users of the resort by providing for additional facilities to meet their needs.</p> <p>Using the Change to fix existing typographical and drafting errors will improve plan usability.</p>	<p>The proposed provisions will be effective in achieving the objectives of the proposal because they will allow development to proceed in the expected manner under the existing THRZ provisions while ensuring clarity / integration of provisions and removing potential sources of confusion.</p> <p>The provision of toilet facilities within Activity Area G as a Permitted Activity, subject to controls on maximum building size and height, is an efficient method of enabling small scale development directly associated with the purpose of the Activity Area.</p> <p>The changes in maximum height are an efficient method of responding to the amended location and extent (including existing ground level in the new location) of the various Activity Areas while avoiding adverse effects on landscape and visual amenity. Likewise the changes to maximum building coverage are an efficient method to ensure the Change remains consistent with the development anticipated under the existing THRZ provisions.</p> <p>The amendments to the drafting of Rules 47.4.3 and 47.4.4 (relating to the establishment of LAMAs) are appropriate to ensure that the provision drafting does not inadvertently give rise to the potential for a matter of control to be treated as an ad hoc standard, and for this “definition” or “standard” to be carried over into the interpretation of other related rules. The amendments are an effective measure to ensure that the outcome of the provisions (requiring consent to establish LAMAs, with Council control reserved to matters including the mechanisms to ensure a LAMA is in place prior to buildings being constructed) are achieved while avoiding confusion for plan users (both applicants and Council planners).</p> <p>The requirement for LAMA or SPA planting to be physically completed for at least six months does not need to be included in the subdivision rule (it remains in existing Rule 4.4.3 and new Rule 4.4.3A) as subdivision does not give rise the effect (being that arising from built form) that the LAMA and SPA provisions address. The retention of control over legal mechanisms and ongoing maintenance requirements are retained and are</p>

		<p>an efficient method to ensure that the planting survives/endures over time.</p> <p>The deletion of the listed Non-Complying activity rules is efficient as the default Non-Complying Activity rule for activities not listed (Rule 47.3.36) ensures that these rules are captured, therefore the removal of duplicate rules will improve plan clarity and usability. The retention of the existing Non-Complying Activity rules relating to Residential Units and Residential Activity (Rules 47.4.12 and 47.4 16) are effective in promoting the definition of “Resort” and the purpose of THRZ in principally providing for visitor accommodation.</p> <p>The addition of Homesite 1 to Rule 47.4.9 to enable visitor accommodation as a Permitted Activity is effective as it meets the intention for this Activity Area to provide for visitor accommodation, as set out in the description for this area in the Zone Purpose, and rectifies this inconsistency between the description and the rules. The provision for visitor accommodation in another Activity Area is consistent with the purpose of THRZ and the “Resort” definition.</p> <p>Overall, the provisions are appropriate for achieving the objectives and the proposal and, hence, the purpose of the Act.</p>
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4. The risk of acting or not acting

Section 32(2)(c) requires an evaluation of the risk of acting and risk of not acting if there is uncertain or insufficient information about the subject matter of these provisions. In this case it is considered that no such uncertainty or insufficiency exists. However, for completeness these are addressed as follows.

Risk of acting

There is no risk of acting (i.e. proceeding with this plan change).

Risk of not acting

The risk of not acting is the likely significant delay, uncertainty and potential lost opportunity (because of the consenting hurdles) to redesign The Hills Golf Course and complementary resort activities and facilities to achieve an international ranking and solidify The Hills' (and the Wakatipu's) international reputation as a premier golfing destination, as well as the lost potential benefits arising from that, and the efficiency and effectiveness of the proposed provisions, as discussed in Part 3 above, would be foreclosed.

5. Evaluation of the provisions under the relevant District Plan objectives

For the purposes of Section 32(3) the proposal is an amending proposal because it will amend the PDP's THRZ. Where a proposal will amend a plan that already exists, the examination under Section 32(1)(b) must relate to the provisions of the proposal and the existing PDP objectives to the extent that those objectives are relevant and would remain if the amending proposal were to take effect.

The amending proposal does not seek to change any specific PDP objectives; all objectives will remain if the amending proposal takes effect.

The examination must therefore address how the provisions of the proposal achieve the PDP's relevant objectives. The PDP sets out the Strategic Direction for the District through Strategic Direction in Chapters 3 to 6. These objectives are then expanded on through policies in the remaining chapters of the PDP.

The relevant objectives for the amending proposal are those in:

- Chapter 3 (Strategic Direction);
- Chapter 5 (Tangata Whenua);
- Chapter 27 (Subdivision and Development); and
- Chapter 47 (THRZ).

In accordance with the definition of *Resort* in the PDP, the proposal does not constitute Urban Development and therefore Chapter 4 (Urban Development) is not relevant.

There are no objectives (only policies) in Chapter 6 (Landscapes and Rural Character) to assess. In accordance with Policy 6.3.1.3, the Outstanding Natural Feature, Outstanding Natural Landscape and Rural Character Landscape categories and the policies of Chapter 6 related to those categories do not apply to Special Zones such as THRZ.

The relevant objectives are addressed in [Table 2](#) below.

Table 2: Evaluation of key relevant objectives of the PDP

Objective	Assessment
Chapter 3 – Strategic Direction	
3.2.1 - The development of a prosperous, resilient and equitable economy in the District.	The positioning of The Hills 18-hole championship course as a course of international acclaim (a top 50 course within the southern hemisphere), the premier course in the South Island and a top five course nationally, will support the prosperity and resilience of the District’s visitor industry economy.
3.2.4 - The distinctive natural environments and ecosystems of the District are protected.	The Landscape Assessment (DOCUMENT 6) supports the Change and discusses how the amendments will have very low extent of adverse effects on the visual amenity and landscape character values of the site and surrounding landscape ⁴ .
3.2.6 - The District’s residents and communities are able to provide for their social, cultural and economic wellbeing and their health and safety.	The Change will enable THRL to better provide for its social, cultural and economic wellbeing through improving the vitality and longevity of the golf course and resort, and the Change will also support increased local, regional and national economic benefits arising from an improved golfing experience at a world-class resort, and the resulting increase in golf tourism spending in the District. The Design Statement (DOCUMENT 5) details how the proposed changes improve the health and safety of visitors through the implementation of golf ball dispersion corridors.
Chapter 5 – Tangata Whenua	
5.2.1 – Consultation with tangata whenua occurs through the implementation of the Queenstown Lakes District Plan Policies	The relevant iwi authorities will be notified as part of the plan change process. Notwithstanding this, initial contact has been made prior to lodgement.
Chapter 27 – Subdivision and Development	
27.3.21 – Subdivision that provides for visitor accommodation, residential and commercial recreation activities developed consistently with the Hills Resort Zone Structure Plan.	The Change will ensure that development is able to be undertaken consistently with the Structure Plan.
Chapter 47 – The Hills Resort Zone	
47.2.1 - An integrated golf resort development that principally provides for a range of visitor industry related activities, while also providing for limited residential activity, all of which are located and designed with particular regard to maintaining the landscape character and amenity values of the Zone and surrounding environment.	The Change is a logical response to the design changes necessary to achieve the objective of the proposal and will ensure that THRL will continue to principally provide for the visitor accommodation industry with improved related onsite visitor activities. While the proposal does seek additional residential homesites as part of the Change, additional provision for VA is also sought, and the overall ratio of visitor accommodation units to residential units is not

⁴

Landscape Assessment Report prepared by Boffa Miskell, dated 8 October 2024

Objective	Assessment
	<p>proposed to change, therefore ensuring the development remains one for resort purposes.</p> <p>The Landscape Assessment (DOCUMENT 6) supports the change and discusses how the changes will have very low extent of adverse effects on the visual amenity and landscape character values of the site and surrounding landscape⁵</p>

By ensuring THRZ can provide for visitor accommodation, commercial recreation and residential activities in an integrated way, the Change will ensure that THRZ can better achieve the district wide objectives and supporting general policies of the PDP. The Change is likely to better enable use of land to contribute positively to the District's growth in a high quality manner that provides for an integrated golf resort development while achieving the relevant high-level provisions relating to the District's landscape and visual amenity values.

6. Evaluation of the provisions under the relevant regional planning instruments

The District Plan must give effect to the operative Otago Regional Policy Statement and have regard to any Proposed Regional Policy Statements. The relevant provisions of the Operative Regional Policy Statement⁶ (**ORPS19**) and the proposed Regional Policy Statement 2021 (**pORPS21**) are assessed in **Table 3** below.

Table 3: Evaluation of key relevant provisions of the regional planning instruments

Objective	Assessment
Operative Regional Policy Statement 2019	
1.1 – Otago's resources are used sustainably to promote economic, social, and cultural wellbeing for its people and communities	The Change is a sustainable use of land within THRZ that can absorb development and promote economic and social wellbeing for people and the local community.
1.2 - Recognise and provide for the integrated management of natural and physical resources to support the wellbeing of people and communities in Otago	THRZ's development as an integrated golf resort is not affected by the Change, but will enable it to occur in a more efficient and effective manner than under the current regime.
Proposed Regional Policy Statement 2021⁷	
IM-O3 – Sustainable impact* Otago's communities provide for their social, economic, and cultural well-being in ways that support or restore environmental integrity, form, functioning, and resilience, so that the life-supporting capacities of air, water, soil, and ecosystems are sustainably managed, for future generations.	The Change is a sustainable use of land within THRZ that can absorb development and promote economic and social wellbeing for people and the local community, and will not adversely affect the life-supporting capacities of air, water, soil or ecosystems. The proposal will have the added benefit of providing for improved biodiversity outcomes through the proposed Structural Planting Areas.

⁵ *Landscape Assessment Report* prepared by Boffa Miskell, dated 8 October 2024

⁶ Which became fully operative on 4 March 2024.

⁷ An asterisk (*) indicates provisions under appeal.

Objective	Assessment
ECO–O2 – Restoring and enhancing* Restoration and enhancement activities result in an overall increase in the extent and occupancy of Otago’s indigenous biodiversity.	The Change includes proposed Structural Planting Areas which will improve the extent and occupancy of grey shrubland species on the site.

Accordingly, the change is consistent with, and gives effect to, the relevant RPS provisions.

A District Plan must not be inconsistent with a Regional Plan. There is one relevant regional plan: the **Regional Plan: Water**. The Regional Plan: Water addresses the use, development and protection of the freshwater resources of the Otago region, the beds and margins of water bodies, and the use, development and protection of those water resources. It provides objectives, policies rules and implementation to address the use and management of the water resources.

To the extent that this regional plan is relevant, the Change is not inconsistent with them because the amended provisions of the District Plan will continue to give effect to the regional plans.

7. Evaluation of the provisions under the relevant national planning instruments

National Policy Statements (**NPSs**) provide objectives and policies for matters of national significance. All subsequent Resource Management documents, including regional policy statements, regional plans and district plans must give effect to (implement) any relevant NPSs.

The following NPSs have no applicability to this requested Change:

- *The New Zealand Coastal Policy Statement*
- *The National Policy Statement for Renewable Electricity Generation*
- *The National Policy Statement on Electricity Transmission*
- *The National Policy Statement for greenhouse gas emissions from industrial process heat*
- *The National Policy Statement on Urban Development*
- *The National Policy Statement for Highly Productive Land*

The *National Policy Statement for Freshwater Management* has limited applicability to the requested Change. The stormwater and wastewater from the development will continue to be managed in accordance with all existing rules, policies and codes of practice, and therefore there will be no adverse effects on any freshwater bodies or groundwater in the catchment. To the extent that this statement is relevant, the requested Change is consistent with it.

Likewise, the *National Policy Statement for Indigenous Biodiversity* has limited applicability to the requested Change. There is no significant indigenous biodiversity existing on the site, and the proposed Structural Planting Areas as shown on the Structure Plan and the associated provisions in Chapter 47 will support an increase in indigenous biodiversity, particularly those associated with grey shrubland, on the site as a direct result of the requested Change. To the extent that this statement is relevant, the requested Change is consistent with it.

8. Summary and conclusions

The above evaluation has examined the Change under section 32 of the Act. The broad conclusions from that evaluation are that:

- (a) Under section 32(1)(a), the objectives of the Change are necessary and are the most appropriate way to achieve the purpose of the Act, taking into account the existing higher order provisions of the Proposed District Plan and the relevant provisions of the regional and national planning instruments;
- (b) The provisions are the most appropriate way to achieve the THRL objectives, taking into account the expert reports and the existing Structure Plan;
- (c) The provisions will be efficient and effective in achieving the objectives, taking into account their costs and benefits including the environmental, social and economic costs and benefits;
- (a) There is no risk to acting, however the risks of not acting are significant to THRL and, to a lesser extent, the wider community.

Overall, for the reasons expressed above, and in the supporting reports including the assessment of effects on the environment, the Change will achieve the higher order objectives of the Proposed District Plan and the purpose and principles of the Act.