

*under:* the Resource Management Act 1991

*in the matter of:* Submissions and further submissions on Queenstown  
Lakes Proposed District Plan 2023

*and:* Urban Intensification Variation

*and:* **Bush Creek Investments Limited**  
(Submitter 777 and Further Submitter 1342)

## Statement of Evidence of Charlotte Clouston

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Dated: 22 August 2025

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Reference: J M Appleyard (jo.appleyard@chapmantripp.com)  
T B Parker (tallulah.parker@chapmantripp.com)

## **STATEMENT OF EVIDENCE OF CHARLOTTE CLOUSTON**

### **INTRODUCTION**

- 1 My full name is Charlotte Lee Clouston.
- 2 I hold the qualifications of Bachelor of Laws (Honours) and Bachelor of Science (Environmental Science and Geography) from the University of Auckland.
- 3 I have 6 years' experience practicing as a planner. Prior to planning, I practiced resource management law for over 2 years. I currently work as a planner for John Edmonds & Associates in Queenstown.
- 4 I am familiar with the BCIL submission and further submissions on the Queenstown Lakes Proposed District Plan 2023 – Proposed Urban Intensification Variation (the *Variation*) to the Queenstown Lakes Proposed District Plan (*PDP*) and its interests in the block of land at 11 – 31 Bush Creek Road, Arrowtown (*BCIL Land*).

### **CODE OF CONDUCT**

- 5 Although this is not an Environment Court hearing, I note that in preparing my evidence I have read the Environment Court's Code of Conduct for Expert Witnesses in its Environment Court Practice Note 2023 and I agree to comply with it. My qualifications as an expert are set out above. I confirm that the issues addressed in this brief of evidence are within my area of expertise. I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

### **SCOPE OF EVIDENCE**

- 6 The purpose of my evidence, I have reviewed:
  - 6.1 Submission 777 and Further Submission 1342;
  - 6.2 Section 42A Reports, dated 6 June 2025;
  - 6.3 Rebuttal Evidence, dated 25 July 2025;
  - 6.4 QLDC Counsel Response to Minute 4, dated 25 July 2025;
  - 6.5 QLDC Proposed District Plan;
  - 6.6 Section 32 Report and Appendices; and
  - 6.7 National Policy Statement on Urban Development 2020 (*NPS-UD*).

## THE SITE CONTEXT

- 7 BCIL owns land at 11 – 31 Bush Creek Road, Arrowtown.
- 8 The existing land use is industrial, comprising multiple tenancies that use the land for storage of machinery and equipment for operation of their respective businesses.
- 9 The site is adjoined by residential townhouses to the south (Essex Avenue) and numerous established small businesses along Bush Creek Road to the east (i.e. mechanic, panelbeater, butcher and bakery). There are residential houses on the northern side of Bush Creek Road.
- 10 The BCIL Land is topographically separate from the Arrowtown Town Centre, sitting at a slightly higher elevation and located west of Feehly Hill (landform feature and scenic reserve).
- 11 The BCIL Land is zoned General Industrial and Service (GIS) Zone in the PDP.
- 12 The PDP zoning is not subject to appeals; therefore, the PDP objectives, policies and rules are deemed operative for the BCIL Land.
- 13 The height limit in the GIS Zone is 10m. The height limit for the BCIL Land in the GIS is 7m, as the site adjoins Meadow Park Special Zone. The activity status for non-compliance with the 7m height limit is Non-Complying.
- 14 Residential Activity, Residential Units and Residential Flats are prohibited activities within the GIS Zone, including for the BCIL Land.

## THE SUBMISSION (OS777)

- 15 The BCIL submission generally supported the Variation, subject to amendments identified in OS777. The submission:

Submission #	Relief sought	S42A recommendation
OS777.1	That the Land described as Lots 1 and 2 DP 18134 be included in the Medium Density Residential Zone (as amended by the Variation) at Arrowtown.	Reject
OS777.2	That the Variation be amended as requested in the submission, together with any	Reject

	alternative, additional, or consequential relief necessary or appropriate to give effect to the matters raised in this submission and/or the relief requested.	
OS777.3	That the Variation is generally supported subject to the amendments identified in the submission.	Accept in part

- 16 There are no further submissions to OS777.

### **POINTS IN CONTENTION**

- 17 My evidence is focused on the rezoning of the BCIL Land.
- 18 My evidence is prepared on the basis that the rezoning request is within the scope of, and squarely 'on', the Variation.
- 19 Legal submissions will be presented at the hearing to discuss any legal scope matters. I do not address legal scope matters further.

### **REZONING OF BCIL LAND**

#### **Section 42A recommendations**

- 20 The s42A report of Ms Bowbyes for Arrowtown discusses at paragraph [4.63] some submissions suggesting the urban environment be extended in locations such as Bush Creek. Her view is that the notified UIV is on the existing urban environment and any proposal to extend the urban environment would be considered in a separate plan change or variation.
- 21 With specific reference to BCIL's submission, Ms Bowbyes considers that the BCIL Land is out of scope of the UIV as the industrial zoning was reviewed as part of the PDP Stage 2 review. There were two submissions and resulting appeals seeking mixed use zoning as part of the Stage 2 review. One appeal was withdrawn, and one was struck out by the Environment Court.
- 22 I do not consider the PDP Stage 2 review / appeal process is relevant to the potential legal scope of the UIV, given this PDP review predated the direction of the NPS-UD and intent of the Variation.
- 23 My view is that the BCIL Land is within the existing 'urban environment'. The GIS zone provisions are included in 'Part Three: Urban Environment' of the PDP. The existing land use of the BCIL Land is urban in character and located inside the Urban Growth Boundary, as is the surrounding residential area.

### **Rezoning**

- 24 I support the rezoning of the BCIL Land from GIS zone. The current GIS zoning prohibits residential activity.
- 25 The BCIL submission sought Medium Density Residential zoning for the BCIL Land.
- 26 I consider that Business Mixed Use (BMU) Zoning would be the most appropriate PDP zoning for the BCIL Land. This is within the scope of the submission as alternative relief that gives effect to matters raised in the submission.
- 27 BMU zoning would provide for a mixture of residential and non-residential uses, in close proximity to Arrowtown Town Centre and the existing commercial activities within the Bush Creek area.
- 28 The surrounding land uses include residential townhouses in the Meadow Park Special Zone to the south (Essex Avenue), and residential units on Bush Creek Road. The BCIL Land is geographically connected to existing residential and commercial uses.
- 29 This zoning would enable a range of activities to establish that service the residential community of Arrowtown, Millbrook and Ayrburn. There is not currently any BMU zoned land within Arrowtown.
- 30 Rezoning of the BCIL Land would enable increased intensification within Arrowtown, acknowledging the significant community opposition raised through the Variation process, against intensification via increased height in existing residential areas.

### **Accessibility**

- 31 The BCIL Land is within close proximity to Arrowtown by public transport, active transport and private vehicle use.
- 32 The Accessibility and Demand Analysis Method Statement (Appendix 3 of the section 32 report) (ADA) considered at section 7.1.1 in terms of accessibility that Arrowtown does not have good access to a large range of employment opportunities within a 45-minute journey time via walking, cycling or public transport. Therefore, no additional up-zoning over and above the existing medium density provisions for Arrowtown was considered warranted based on the result of the accessibility analysis.
- 33 It is important to note that the ADA was prepared in May 2023. There have been public transport improvements in that time that increase accessibility in my view.
- 34 The ADA modelled a 5-minute and 10-minute walking time catchment for the Arrowtown Town Centre to reflect the reduced scale and diversity of commercial and community activities

available. The ADA does not reflect the existing commercial activities operating on Bush Creek Road (including a butcher, bakery, cheese shop, bike shop, bike mechanic and engineering consultancy as examples) in the catchment analysis. There are also existing residential units above some of the commercial units at the property adjoining BCIL Land to the south (9 Bush Creek Road).

- 35 The employment opportunities modelled in Figure 6 of the ADA show the BCIL Land as offering the second most opportunities within the Arrowtown area (the town centre being the highest).
- 36 The Queenstown Trail network runs along Manse Road, in front of Bush Creek Road, as a shared cycle and pedestrian trail. This connects to the Arrowtown Town Centre to the north, and Millbrook and beyond to the south.
- 37 The distance between the BCIL Land and the Arrowtown Town Centre (Buckingham Street, Arrowtown Bakery as a reference) is 1km distance and approximately 3 minutes drive / 14 minutes walking / 4 minutes cycling (according to Google Maps).
- 38 Walking distance of 1km is the average trip leg for pedestrians as referenced in the Accessibility and Demand Analysis Method Statement (Appendix 3 of the section 32 report). This is therefore considered an appropriate walking distance.
- 39 There is also a bus stop located on Manse Road near the Malaghans Road intersection, which is serviced by bus route 4, connecting Arrowtown to Jacks Point. This bus stop is approximately 550m walk (approximately 7 minutes) from the BCIL Land.
- 40 The bus stops in Arthurs Point, Queenstown and Frankton en route to Jacks Point, with connections to other bus routes in both Queenstown and Frankton. This bus operates at half hourly frequency at peak times between 6-9am and 3-6pm, and hourly outside of peak times. The route includes service to and from Wakatipu High School on school days. The bus also stops in Arrowtown Town Centre and the Four Square at the northern end of Arrowtown.
- 41 I note that the number and location of bus stops (and service frequency) will change over time in response to the location of development. So, as more land is zoned and developed there may be changes to the accessibility of neighbourhoods.
- 42 The Manse Road bus stop is not shown on the Transport Opportunities Catchment Assessment for Arrowtown (Figure 12 of the ADA). This is likely a result of the time elapsed between completion of the ADA in 2023 and the current public transport environment.

- 43 The BCIL Land area therefore has public transport connections, which increase accessibility to Arrowtown Town Centre as well as other commercial centres.

***Demand***

- 44 The ADA discussion of demand indicates at section 6.1.4 that *'any measures that remove barriers to development (e.g. increased building heights) will likely increase land prices/values and improve feasibility for redevelopment'*.
- 45 The BCIL Land is shown in Figure 15 of the ADA to have an average Land value to capital value ratio of 0.75-0.99. The observations in section 6.1.6 of the ADA consider that the upper quartile (above 0.75:1) provides a useful proxy for areas where intensification may be more feasible to deliver. In particular: *"The analysis generally shows a concentration of parcels with ratios above 0.75:1 in areas with high land prices indicating the potential for increased intensification opportunities to be taken up by the market"*.
- 46 Based on this rationale, I consider that the BCIL Land has intensification potential. Arrowtown is a desirable place to live within the district and attracts high house prices.
- 47 The relative demand analysis for Arrowtown did not include consideration of the public transport on Manse Road, and the commercial offerings on Bush Creek Road, as many of these (i.e. butchery and bakery) opened after the ADA was completed.
- 48 The mixed-use activities on Bush Creek Road creates a small-scale centre. This area can perform an important role for the local community, including the western extent of Arrowtown, in providing small scale offerings (e.g. butcher/bakery/coffee) within a closer proximity than Arrowtown Town Centre. My view is that these opportunities contribute towards the area's overall level of accessibility and demand. The Bush Creek area also provides employment opportunities through the existing industrial and commercial land uses.
- 49 The Arrowtown community has raised many concerns through submissions on the UIV regarding increased height and density of housing within the existing residential zones. The BCIL Land provides an area of land that could accommodate a more intensive land use, including duplex/terrace housing or apartments, without affecting the character of the existing residential zones. This is based on the location of the BCIL Land, with hills and reserve area to the north and west. There is existing high density residential land use (Essex Avenue) directly to the south, which comprises 22 terrace houses (semi-detached dwellings) approved by resource consent RM040230.
- 50 The BCIL Land is outside of the area shown as 'constrained' by section 6 RMA historic heritage constraints and section 7 RMA

amenity value / character constraints, in Appendix 1 of the Memorandum of Counsel (QLDC) response to Minute 4, dated 25 July 2025. I do not consider the BCIL Land is constrained by these matters, noting the existing land use and zoning.

***Appropriate zoning and height in line with the NPS-UD***

- 51 In my view, a Business Mixed Use zoning would more appropriately enable intensification on the BCIL Land, consistent with the residential activities already occurring to the north and south, as well as existing commercial activities along Bush Creek Road.
- 52 The BCIL Land is appropriately located to absorb additional height, without changing the character of existing residential zones that are the subject of numerous submissions in opposition.
- 53 In my view, enabling greater intensification of the BCIL Land (including residential use) will contribute to the perceived shift in dwelling typology of Arrowtown over time, by enabling more intensive built form in a part of Arrowtown that can absorb change.
- 54 I support the recommended changes to the Business Mixed Use zone provisions in terms of building height increase in the Variation.
- 55 I recommend the following changes (addition underlined) to Rules 16.5.8 and 16.5.9 associated with the rezoning of the BCIL Land:
- 16.5.8: Discretionary building Height*
- 16.5.8.1 Queenstown, Frankton North and Wānaka (Three Parks) – 16.5m*
- 16.5.8.2 Frankton Marina (Sugar Lane) and Arrowtown – 12m*
- 16.5.9: Maximum building height*
- 16.5.9.1 Maximum building height shall be: ...*
- f. Arrowtown – 16.5m*
- 56 In line with Policy 5 of the NPS-UD, I consider the height limits should be increased for the BCIL Land as set out above, to be commensurate with the level of accessibility and demand, that is higher than it was at the time of the section 32 reporting.
- 57 I am of the view that the entire GIS zoned land could be rezoned BMU zone, from a planning perspective. However, given these parties have not been active in the Variation process, I do not consider this further. The size of the BCIL Land on its own is sufficient for a mixed-use development to establish and contribute to a well-functioning urban environment within this neighbourhood.



- 58 I am not aware of any constraints that would require retention of the GIS zoning of the BCIL Land.

**Section 32AA analysis**

- 59 The section 32 reporting did not include any comment or option assessment for rezoning of the BCIL Land, or land near the Arrowtown Town Centre.
- 60 I consider this is a failure to capture all land within the urban environment deemed appropriate for commensurate intensification in line with the NPS-UD.
- 61 For the recommended rezoning of the BCIL Land from GIS zone to BMU zoning, I make the following comments with respect to section 32AA matters:
- 61.1 The recommended rezoning will more efficiently and effectively achieve the relevant objectives of the PDP, particularly Objective 3.2.3.2 as it will provide for built form that integrates well with the surrounding urban environment. This is particularly relevant given the mixed-use nature of the units at the adjacent site at 9 Bush Creek Road, and the residential terrace type housing on Essex Avenue to the south.
  - 61.2 The Bush Creek area is currently a mixed-use neighbourhood, and rezoning of the BCIL Land would better reflect this and enable better integration of built form.
  - 61.3 Increasing the permitted height limit for the BCIL Land will enable intensification in built form, increasing potential density of development that is commensurate with the accessibility of the area.
  - 61.4 There is QLDC three waters infrastructure servicing Bush Creek Road and the vicinity of the site. Mixed-use development of the BCIL Land could be appropriately serviced, including any connections and upgrades needed for a particular development.
  - 61.5 The benefits are considered to outweigh the costs. There are significant costs to rezone this land through a separate plan change process.
  - 61.6 The current zoning does not enable residential activity on the BCIL Land. The prohibited activity status for residential activity is inconsistent with some existing residential land uses in this area of GIS.
  - 61.7 Business Mixed Use zoning would enable a range of activities to be established on the BCIL Land that contribute to a well-functioning urban environment, in line with the NPS-UD.

61.8 The BMU zone provisions in the PDP are appropriate. For completeness, I have provided a comparison of the GIS provisions in **Appendix 1**. In my view, no bespoke provisions for the BCIL Land are required.

### **CONCLUSIONS**

62 I support the relief sought by BCIL, for amendment to the zoning of the BCIL Land to enable intensification. My position is that Business Mixed Use zoning is the most appropriate zoning, to enable a well-functioning urban environment.

Dated: 22 August 2025



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Charlotte Clouston

## APPENDIX 1 – COMPARISON OF PROVISIONS

PDP – General Industrial and Service Zone	PDP – Business Mixed Use Zone	Analysis
<p>18A.4.1 Industrial activities and Service activities – permitted</p> <p>18A.4.2 Office, Retail and Commercial activities that are ancillary to Industrial or Service activities on the same site – permitted</p>	<p>16.4.10 Industrial Activities not otherwise provided for in this Table – non-complying</p>	<p>The ongoing use of the site for industrial activity is provided for through existing use rights. PDP activity status is appropriate for development going forward.</p>
<p>18A.4.3 Commercial sale of food and beverages including restaurants, takeaway food bars and Licensed Premises – permitted</p>	<p>Licensed Premises – restricted discretionary</p> <p>Premises licensed for the consumption of alcohol on the premises between the hours of 11pm and 8am, provided that this rule shall not apply to the sale of liquor:</p> <p>This rule shall not apply to the sale and supply of alcohol:</p> <ul style="list-style-type: none"> <li>a. to any person who is residing (permanently or temporarily) on the premises; and/or</li> <li>b. to any person who is present on the premises for the purpose of dining up until 12am.</li> </ul> <p>Discretion is restricted to consideration of the following:</p> <ul style="list-style-type: none"> <li>a. the scale of the activity;</li> <li>b. car parking and traffic generation;</li> <li>c. effects on amenity (including that of adjoining residential zones and public reserves);</li> <li>d. the configuration of activities within the building and site (e.g. outdoor seating, entrances);</li> <li>e. noise issues; and</li> <li>f. hours of operation.</li> </ul>	<p>Commercial sale of food and beverages remains a permitted activity within the BMU zone, except for Licensed Premises.</p>

<p>18A.4.4 Outdoor Storage – permitted</p>	<p>16.5.2 Storage</p> <p>Outdoor storage and storage of waste and recycling shall be screened from public places and adjoining Residential zones.</p> <p>Non-compliance: restricted discretionary</p>	<p>Outdoor storage is permitted in the BMU zone provided it is adequately screened, in line with the standards.</p> <p>No additional provisions required.</p>
<p>18A.4.5 i. Office, Retail or Commercial activities lawfully established prior to [date Chapter 18A is treated as operative]</p> <p>ii. The relocation of an Office, Retail or Commercial activity lawfully established prior to [date Chapter 18A is treated as operative] within the same building or tenancy on the same site as the lawfully established activity</p> <p>iii. Office, Retail or Commercial activities that replace an Office, Retail or Commercial activity that is of the same nature, character and scale as the activity that was lawfully established prior to [date Chapter 18A is treated as operative]</p> <p>For the purposes of 18A.4.5(iii), this rule does not enable switches between activity types. It provides for an activity to replace an activity of the same type. Rule 18A.4.17B should be applied in cases where switches between Office, Commercial and Retail activity types are being sought.</p> <p>For the purposes of this rule, “lawfully established prior to [date Chapter 18A is treated as operative]” includes Office, Retail or Commercial activities within buildings where that building was granted resource consent and the activity would have been permitted within the building at the time of the grant of consent under the previous zoning provisions, despite whether the subject Office, Retail or Commercial activity had commenced prior to [date Chapter 18A is treated as operative].</p> <p>- Permitted</p>	<p>16.4.1 Activities which are not listed in this table and comply with all standards – permitted</p> <p>There are office and retail specific provisions for Frankton North and Frankton Marina only.</p>	<p>The BMU zoning is more permissive for the land use activity. The focus is on built form standards.</p> <p>No changes to PDP needed.</p>

<p>18A.4.6 Buildings – restricted discretionary</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> <li>a. external appearance, including materials and colours;</li> <li>b. landscaping at the interface of the site with adjacent roads and public places;</li> <li>c. signage platforms;</li> <li>d. lighting;</li> <li>e. the external appearance and proximity to the street front of any ancillary activities, including Office, Retail and Commercial activities;</li> <li>f. servicing, including water supply, stormwater and wastewater;</li> <li>g. access, manoeuvring, and loading;</li> <li>h. location and provision of waste and recycling storage space;</li> <li>i. the contribution the building makes to the safety of the General Industrial and Service Zone through adherence to CPTED principles;</li> <li>j. natural hazards; and</li> <li>k. where Electricity Sub-transmission Infrastructure or Significant Electricity Distribution Infrastructure as shown on the District Plan web mapping application is located within the adjacent road, any adverse effects on that infrastructure.</li> </ul>	<p>16.4.4 Buildings – restricted discretionary</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> <li>a. building materials;</li> <li>b. glazing treatment;</li> <li>c. symmetry;</li> <li>d. vertical and horizontal emphasis;</li> <li>e. location of storage;</li> <li>f. signage platforms;</li> <li>g. landscaping;</li> <li>h. where residential units are proposed as part of a development, provision made for open space on site whether private or communal;</li> <li>i. where applicable, integration of the development with Horne Creek, including site layout and landscaping; and</li> <li>j. where a site is subject to any natural hazard and the proposal results in an increase in gross floor area: <ul style="list-style-type: none"> <li>i. the nature and degree of risk the hazard(s) pose to people and property;</li> <li>ii. whether the proposal will alter the risk to any site; and</li> <li>iii. the extent to which such risk can be avoided or sufficiently mitigated.</li> </ul> </li> <li>k. Where Electricity Sub-transmission Infrastructure or Significant Electricity Distribution Infrastructure as shown on the District Plan web mapping application is located within the adjacent road and any proposed building is located within 9.5m of that road boundary, any adverse effects on that infrastructure.</li> </ul>	<p>The matters of discretion in the BMU adequately capture the provisions of the GIS zone.</p> <p>No bespoke provisions for the BCIL Land are considered necessary.</p>
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	<p>Assessment matters relating to buildings:</p> <p>a. the impact of the building on the streetscape including whether it contributes positively to the visual quality, vitality, safety and interest of streets and public places by providing active and articulated street frontages and avoids large expanses of blank walls fronting public spaces;</p> <p>b. whether the design of the building blends well with and contributes to an integrated built form and is sympathetic to the surrounding natural environment.</p>	
18A.4.7 Buildings within the Outer Control Boundary – restricted discretionary	N/A	N/A
18A.4.8 Trade Suppliers – discretionary	<p>16.4.7 Warehousing, Storage &amp; Lock-up Facilities (including vehicle storage) and Trade Suppliers except as provided for by Rule 16.4.20 – restricted discretionary</p> <p>Discretion is restricted to:</p> <p>a. the impact of buildings on the streetscape and neighbouring properties in terms of dominance impacts from large, utilitarian buildings;</p> <p>b. the provision, location and screening of access, parking and traffic generation; and</p> <p>c. landscaping; and</p> <p>d. at Frankton North, effects on adjoining residential areas and activities.</p>	Matters of discretion are considered appropriate for these activities on the BCIL Land.
18A.4.9 Outdoor storage and Outdoor waste storage within any building restriction area shown on any structure plan within Chapter 27 (Subdivision and Development) – non-complying	N/A	N/A
18A.4.10 Commercial Recreation and Recreation activities – non-complying	16.4.1 Activities which are not listed in this table and comply with all standards – permitted	The BMU zoning is more permissive for the land use activity. The focus is on built form standards.

18A.4.11 Community activities and Community Facilities – non-complying	<p>16.4.6 Daycare Facilities – restricted discretionary</p> <p>Discretion is restricted to:</p> <ul style="list-style-type: none"> <li>a. the compatibility of the development with respect to existing land uses on the subject site and nearby properties;</li> <li>b. potential reverse sensitivity issues;</li> <li>c. traffic, parking and access limitations; and</li> <li>d. noise.</li> </ul>	<p>The BMU zoning is more enabling. The matters of discretion are considered appropriate, particularly given matter (a) addresses compatibility with existing land uses on site and surroundings.</p> <p>No additional provisions required.</p>
18A.4.12 Any activity requiring an Offensive Trade Licence under the Health Act 1956 other than the “collection and storage of used bottles for sale” and “refuse collection and disposal” (as listed in that Act) – non-complying	<p>16.4.1 Activities which are not listed in this table and comply with all standards – permitted</p> <p>16.4.13 Fibreglassing, sheet metal work, bottle or scrap storage, motorbody building or wrecking – prohibited</p>	Bottle and scrap storage is included in the prohibited activity status for the BMU zone. BCIL does not request this provision be rolled over into the BMU zone.
18A.4.13 Any building within a Building Restriction Area that is identified on the District Plan web mapping application – non-complying	N/A	N/A
18A.4.14 Activities that are not listed in this Table – non-complying	16.4.1 Activities which are not listed in this table and comply with all standards – permitted	The BMU zoning is more permissive for the land use activity. The focus is on built form standards.
18A.4.15 Large Format Retail – Prohibited	16.4.1 Activities which are not listed in this table and comply with all standards – permitted	The BMU zoning is more permissive for the land use activity. The focus is on built form standards, with all buildings requiring resource consent.
18A.4.16 Activities Sensitive to Aircraft Noise within the Queenstown Airport Outer Control Boundary or the Queenstown Airport Air Noise Boundary – Prohibited	16.4.19 Activities Sensitive to Aircraft Noise within the Queenstown Airport Outer Control boundary – prohibited	No change – no effect on BCIL Land.
18A.4.17 Office, Retail and Commercial activities lawfully established prior to [date Chapter 18A is treated as operative] that do not comply with rule 18A.4.5 – non-complying	16.4.1 Activities which are not listed in this table and comply with all standards – permitted	The BMU zoning is more permissive for the land use activity. The focus is on built form standards.

<p>18A.4.17B Changes from an Office, Retail or Commercial activity lawfully established prior to [date Chapter 18A is treated as operative] to either an Office or Commercial activity (excluding Retail).</p> <p>For the purposes of this rule, "lawfully established prior to [date Chapter 18A is treated as operative]" includes Office, Retail or Commercial activities within buildings where that building was granted resource consent and the activity would have been permitted within the building at the time of the grant of consent under the previous zoning provisions, despite whether the subject Office, Retail or Commercial activity had commenced prior to [date Chapter 18A is treated as operative]. – non-complying</p>	<p>There are office and retail specific provisions for Frankton North and Frankton Marina only.</p>	<p>Office, retail and commercial activities are present within the existing GIS zoned land and new activities in this realm could complement the existing area.</p> <p>I see no reason for these activities to be prohibited, or for specific provision for BCIL Land to be added to BMU zone.</p>
<p>18A.4.18 Office, Retail and Commercial activities not otherwise identified – Prohibited</p>		
<p>18A.4.19 Residential Activity, Residential Units and Residential Flats – prohibited</p>	<p>Residential activities are permitted provided all standards can be complied with.</p>	<p>Given the surrounding residential activities, I consider a prohibited activity status is not appropriate. The built form of any residential use will be assessed through resource consent, including compliance with acoustic insulation standards.</p>
<p>18A.4.20 Visitor Accommodation, Residential Visitor Accommodation and Homestay activities – prohibited</p>	<p>16.4.2 Residential Visitor Accommodation and Homestays – permitted (provided standards in 16.5.13 and 16.5.14 are met)</p> <p>16.4.3 Visitor Accommodation – controlled</p> <p>Control is reserved to:</p> <ul style="list-style-type: none"> <li>a. the location, provision, and screening of access and parking and traffic generation;</li> <li>b. landscaping;</li> </ul>	<p>The matters of control are appropriate for visitor accommodation in this location.</p> <p>The matters of control for residential visitor accommodation exceeding 120 nights per annum and or homestay exceeding five paying guests per night are appropriate (Standards 16.5.13 and 16.5.14).</p> <p>The built form will be assessed through resource consent, including</p>



	<p>c. the location, nature and scale of visitor accommodation and ancillary activities relative to one another within the site and relative to neighbouring uses;</p> <p>d. the location and screening of bus and car parking from public places; and</p> <p>e. where the site adjoins a residential zone:</p> <p>i. noise generation and methods of mitigation; and</p> <p>ii. hours of operation, in respect of ancillary activities.</p>	assessment matters of integration of built form.
18A.4.21 Airport – prohibited	16.4.18 Airport – prohibited	No change.
18A.4.22 Mining activities – prohibited	16.4.16 Mining Activities – prohibited	No change.
	16.4.11 Service Stations – non-complying	BCIL does not have any issue with the non-complying activity status for these activities.  No reason to request change.
	16.4.12 Panelbeating, spray painting, motor vehicle repair or dismantling – non-complying	
	16.4.13 Fibreglassing, sheet metal work, bottle or scrap storage, motorbody building or wrecking – prohibited	BCIL does not have any issue with the prohibited activity status for these activities.  No reason to request change.
	16.4.14 Fish or meat processing (excluding that which is ancillary to a retail premises such as a butcher, fishmonger or supermarket) – prohibited	
	16.4.15 Factory Farming – prohibited	
	16.4.17 Forestry Activities, except for Plantation Forestry where the Resource Management (Resource Management (National Environmental Standard for Plantation Forestry) Regulation 2017 prevails – prohibited	
	16.4.21 Cemeteries and Crematoria – prohibited	
18A.5.1 Ancillary Office, Retail and Commercial Activities	No related standards in the BMU zone.	

18A.5.2 Office, Commercial or Retail activities provided for under 18A.4.5		The BMU zoning is more permissive for the land use activity. The focus is on built form standards.  No additional provisions required in BMU zone.
18A.5.3 Commercial sale of food and beverages including restaurants, takeaway food bars and Licensed Premises (excluding the sale of liquor)		
18A.5.4 Minimum Boundary Setbacks	16.5.1 Setbacks and sunlight access – sites adjoining a Residential zone	Appropriate provision in PDP for sites adjoining residential. No bespoke provision required.
18A.5.5 Building coverage  Maximum building coverage of 75%  Non-compliance: restricted discretionary	16.5.4 Building Coverage  Maximum building coverage of 75%  Non-compliance: discretionary	Same standard of 75%. No bespoke provision required.
18A.5.8 Building Height – Sites adjoining or separated by a road from any of the following zones ... Meadow Park Special Zone  Maximum building height of 7m	16.5.8 Discretionary building Height  16.5.9 Maximum building height	I have made recommendations for amendment to rules 16.5.8 and 16.5.9 for Arrowtown BMU zone.
18A.5.9 Glare	16.5.11 Lighting and Glare	No addition necessary.
18A.5.10 Outdoor storage	16.5.2 Storage	All outdoor storage to be screened. No addition necessary.
18A.5.11 Fencing  Any site adjoining any of the following zones shall establish a solid fence at least 2m in height, or dense planting that shall achieve the same height, along the site boundary: ... Meadow Park Special Zone  Non-compliance: restricted discretionary	16.5.6 Fencing  A solid fence of 1.8m shall be erected on the boundary of any residential zone.  Non-compliance: discretionary	Intent provided for in the BMU zone provisions. No addition necessary.
	16.5.5 Acoustic insulation	No change to BMU provisions needed for inclusion of BCIL Land.
	16.5.10 Noise	