

To: Ayrburn Screen Hub FTAA Expert Panel

From: Karl Cook

Date: 23 January 2026

Re: Ayrburn Screen Hub Substantive Application - FTAA-2508-1093 – Applicant Response

1.0 Introduction

My name is Karl Cook. My qualifications and experience are as set out in section 3.1 of the Ayrburn Screen Hub Planning Report dated 18 November 2025.

This statement has been prepared to address:

- (1) Planning-related matters raised in comments provided under section 53 of the FTAA, in particular:
 - (a) the planning review by Mr Langman for QLDC dated 12 December 2025 (Marcus Langman planning review); and
 - (b) the planning evidence of Mr Vivian in support of the comments of Jan Andersson, David Kidd and James & Rebecca Hadley dated 17 December 2025 (Carey Vivian planning evidence).
- (2) Consents required for proposed planting and amenity mitigation.
- (3) Amendments to proposed conditions.

I confirm that this statement has been prepared in accordance with the Environment Court’s Code of Conduct for Expert Witnesses as specified in the Environment Court’s Practice Note 2023. This statement is within my area of expertise, except where I state that I rely upon the evidence of other experts. I have not omitted to consider any material facts known to me that might alter or detract from the opinions expressed.

2.0 Planning Matters

In reviewing the statements of Mr Langman and Mr Vivian I note that there are several areas of agreement. Accordingly, in the sections that follow I focus on planning provisions that are not addressed in the Ayrburn Screen Hub Planning Report and Planning Provisions Assessment, both dated 18 November 2025 (together referred to in this statement as the “application planning assessment”) and on aspects of assessments by Mr Langman and Mr Vivian that I do not agree with. I note where there is agreement with those assessments and make no further comment.

2.1 Urban Development

I agree with Messrs Langman and Vivian¹ that the proposal constitutes “Urban Development” as defined in the PDP. I assess the PDP planning provisions as relevant to this below.

¹ Marcus Langman planning review, paragraph 33 and Carey Vivian planning evidence, paragraph 10.

2.1.1 PDP Chapter 3 Strategic Direction

In assessing Chapter 3 in terms of the classification of the proposal under the PDP as a form of urban development, I note that in its stated purpose, Chapter 3 sets out “the over-arching strategic direction for the management of growth, land use and development”.

Of further relevance to an assessment of Chapter 3, clause 3.1B Interpretation and Application of this Chapter states:

3.1B.2 For the purpose of plan implementation (including in the determination of resource consent applications and notices of requirement):

- a. the Strategic Objectives and Strategic Policies in this Chapter may provide guidance on what the related objectives and policies in other chapters of the Plan are seeking to achieve in relation to the Strategic Issues;*
- b. the relevant objectives and policies of the plan (including Strategic Objectives and Strategic Policies in this Chapter) are to be considered together and no fixed hierarchy exists between them.*

Chapter 3 of the PDP addresses the following six strategic issues:

- a. Strategic Issue 1: Economic prosperity and equity, including strong and robust town centres, and the social and economic wellbeing and resilience of the District’s communities may be challenged if the District’s economic base lacks diversification and supporting infrastructure.*
- b. Strategic Issue 2: Growth pressure impacts on the functioning and sustainability of urban areas, and risks detracting from rural landscapes, particularly its outstanding natural features and outstanding natural landscapes.*
- c. Strategic Issue 3: High growth rates can challenge the qualities that people value in their communities.*
- d. Strategic Issue 4: Some resources of the District’s natural environment, particularly its outstanding natural features and outstanding natural landscapes and their landscape values, require effective identification and protection in their own right as well as for their significant contribution to the District’s economy.*
- e. Strategic Issue 5: The design of developments and environments can either promote or weaken safety, health and social, economic and cultural wellbeing.*
- f. Strategic Issue 6: Tangata Whenua status and values require recognition in the District Plan.*

In relation to urban development, Issue 2 is addressed both through objectives and policies relating to urban growth management and those relating to retention of distinctive landscapes (under which the Wakatipu Basin Rural Amenity Zone values apply).

Given the zoning of the site, I consider the primary PDP provisions of relevance to the proposal to be those in Chapter 24 – Wakatipu Basin, within Part Four: Rural Environment in the PDP. I rely primarily on the application planning assessment of Chapter 24 of the PDP, noting that I provide additional assessment below.

The application planning assessment addresses several objectives and policies in Chapter 3. I make the following additional comments in assessment of Chapter 3 of the PDP:

- In the context of the direction in clause 3.1B Interpretation and Application of this Chapter (as included above) and a proposal that seeks to support the District’s economic base through diversification, I consider that a broad assessment is appropriate.
- In relation to specific objectives and policies within Chapter 3, I generally support the assessment in Attachment 2 to Mr Langman’s planning review of the Chapter 3 provisions not addressed in the application planning assessment. However, I add the following assessment of particular provisions:
 - While in relation to SO 3.2.5.8 Mr Langman cites the landscape peer review by Bridget Gilbert, I note that the application included assessments by Mr Milne and a peer review (that are not acknowledged). Subsequent to those landscape assessments, a Landscape Joint Witness Statement and supplementary assessments by Mr Milne (and a further peer review) have been prepared. While there are areas of disagreement among the landscape experts, Mr Milne concludes, in relation to the Chapter 24 policies that give effect to this strategic objective, that: “the proposal is not inconsistent with those policies relating to the maintenance of landscape character and visual amenity values across the LCU and the landscape character of the Wakatipu Basin as a whole”.²
 - SO 3.3.15 is to “Apply provisions that ...avoid urban development outside of the UGBs.” (emphasis added), and in context applies to plan development. In that regard I consider these provisions to be of limited relevance to a particular development proposal, other than to provide guidance on the absence of provision for urban development within the Wakatipu Basin Rural Amenity Zone.
- In relation to Mr Vivian’s assessment of Chapter 3 at pages 6-18 I rely on the application planning assessment of Chapter 3 of the PDP and add the following assessment of particular provisions:
 - In relation to the appropriateness of the location in terms of SO 3.2.1.1 and having regard to the land area and the particular nature of the proposal - incorporating an integrated commercial component (screen facilities) and temporary worker/visitor accommodation – it is not necessarily well suited to industrial, centres, residential or other zones within the UGB either, because of the particular combination of uses and the land area required.
 - I do not agree that classification of the proposal as urban development under the PDP definition means that it is inconsistent with SO 3.2.3. That objective relates to a quality built environment, and in my view is not relevant to the proposal being defined as urban development.

2.1.2 PDP Chapter 4 Urban Development

As with my assessment above of Chapter 3 in relation to urban development, I make the following comments in assessment of Chapter 4 of the PDP:

- To the extent that the proposal involves urban development in an area not identified for the purpose in the PDP, I generally agree with Messrs Langman and Vivian that it is not consistent with particular provisions seeking avoidance of this (specifically, Policy 4.2.1.3 and Policy 4.2.2.20).
- However, Policy 4.2.2.3 relates to residential development and Policy 4.2.2.7 to affordable housing. In my view these policies are not relevant to the proposal, and it is thus not inconsistent with them.

² Page 4, Second Supplementary Landscape Assessment Memo, dated 21 January 2026.

- In relation to specific objectives and policies within Chapter 4, I generally support the assessment in Attachment 2 to Mr Langman’s planning review of the Chapter 4 provisions not addressed in the application planning assessment. However, I add the following assessment of particular provisions:
 - Similar to SO 3.3.15 in Chapter 3, Objective 4.2.1 identifies UGBs as a “policy tool to manage growth” and in my view is of limited relevance to a particular development proposal. Further, I agree with Mr Milne’s assessment in relation to defensible edges³ and consider that the proposal would be seen within the Ayrburn Structure Plan framework of open space.
 - In relation to lighting in terms of Policy 4.2.2.10, I refer to a Draft Light Management Plan included as **Attachment 1**, which is addressed in more detail in section 2.6 below.
 - In relation to significant indigenous flora and fauna in terms of Objective 4.2.2 B, I refer to the findings of ecological assessments included as **Attachments 2 and 3**, which are addressed in more detail in section 2.7 below.
- In relation to Mr Vivian’s assessment of Chapter 4 at pages 18-26 I add the following assessment of particular provisions:
 - Further to my comment above in relation to Objective 4.2.1, I do not agree that simply by virtue of the proposal involving an urban development located outside of the UGBs means that it is inconsistent with a provision identifying the role of this tool (to manage the growth of urban areas).
 - For similar reasons, I do not agree that the proposal is inconsistent with Objective 4.2.2A & B, Policy 4.2.1.4 and Policy 4.2.2.13, as these provisions are concerned with UGBs as a tool. I also do not agree that the proposal is inconsistent with Policy 4.2.1.2, because it contains qualifying words (“focus” and “primarily”). However, I have noted above that I agree with Messrs Vivian and Langman that the proposal is inconsistent with Policy 4.2.1.3, which is directive in its language regarding avoiding urban development outside of the UGBs.

2.1.3 Queenstown Lakes Spatial Plan (Spatial Plan)

I agree with the assessment at paragraph 67 of the planning review by Mr Langman that the proposal is not consistent with the urban development location and consolidated growth provisions (on pages 59 and 52 respectively of the Spatial Plan).

However, I also note the following by way of further assessment of the Spatial Plan:

- To the extent that the proposal preserves the significant portion of Open Space areas within the Ayrburn Structure Plan in the PDP, I consider that it is consistent overall with the “Protected areas and open space” statements on page 52 of the Spatial Plan.
- For the reasons in section 10.5.1 of the Ayrburn Screen Hub Planning Report, I consider that the proposal is consistent with the following parts of “Outcome 5: A diverse economy where everyone can thrive” of the Spatial Plan (pages 1-5-112):
 - Strategy 14: Diversity the economy:

While the existing Economic Development Strategy prioritises the need for diversification, the impact of the pandemic on the Queenstown Lakes economy provides fresh impetus to review the approach with

³ Page 9, Supplementary Landscape Assessment Memo, dated 9 January 2026 (s55 Response Document 10).

more focus on detailed implementation. Priority sectors for economic development include low-carbon, non-extractive industries such as the growing film industry and regenerative initiatives that will create high value jobs in the Queenstown Lakes. A more diversified economy will insure against such significant shocks, supporting the tourism industry to continue to deliver an exceptional visitor experience whilst protecting the wellbeing of local communities

- I consider the proposal to be neutral in relation to statements in “Strategy 15: Make spaces for business success”, which recognises that more space will be required as the economy diversifies and grows, but seeks to support most new employment being in major centres and recognises further provisions will be made in future urban areas.

For the reasons above, I consider that the proposal aligns strongly with the Queenstown Spatial Plan’s vision for sustainable growth, diverse employment, and vibrant communities, and while not consistent with specific urban growth-related statements, I do not agree with Mr Langman that it is contrary to the Spatial Plan on an overall basis.

2.1.4 NPS-UD

While the proposal is an “urban development” as defined in the PDP, I do not agree with Mr Langman that the NPS-UD applies because, as stated in section 10.2.2 of the Ayrburn Screen Hub Planning Report:

The site is zoned WBRAZ under the QLDC PDP, which is a Rural Zone and not part of an urban environment. The NPS-UD is intended to guide urban growth and intensification within urban areas. As the proposal is located in a rural zone and does not relate to urban development, the NPS-UD is not relevant to this application.

2.2 PDP Chapter 6 Rural Character

I agree with Mr Langman that, for the reason the WBRAZ zoning applying to the site means it is not within a Rural Character Landscape (RCL), the objectives and policies in Chapter 6 are not relevant. In particular, Policy 6.3.1.4 states that:

Provide a separate regulatory regime for the Wakatipu Basin Rural Amenity Zone, within which the Outstanding Natural Feature, Outstanding Natural Landscape and Rural Character Landscape categories and the policies of this Chapter related to those categories do not apply.

The PDP chapter of primary relevance is therefore Chapter 24 – Wakatipu Basin.

However, Policy 6.3.4.9 in Chapter 6 states:

In the Wakatipu Basin, avoid planting and screening, particularly along roads and boundaries that would degrade openness where such openness is an important part of its landscape character.

While this policy is under Objective 6.3.4 Managing Activities in Rural Character Landscapes and the site is not within a RCL (meaning there appears to be an internal contradiction in Chapter 6), it does refer specifically to the Wakatipu Basin.

To the extent Policy 6.3.4.9 may be relevant, I do not agree with Mr Vivian⁴ that the proposal is inconsistent with this policy because it refers to “planting and screening, particularly along roads and boundaries that would degrade openness” yet he refers to large buildings within the Open Space area. In my view the

⁴ Carey Vivian planning evidence, page 31.

Chapter 24 provisions are the relevant framework for assessing the impact of the proposed buildings on the openness part of landscape character of the WBRAZ.

2.3 PDP Chapter 24 Wakatipu Basin

Messrs Langman and Vivian provide assessments of Chapter 24, including comments on the planning assessment provided with the application. As noted above, I rely primarily on that planning assessment provided in relation to Chapter 24 of the PDP. Further, I note the assessment by Mr Milne in the Second Supplementary Landscape Assessment Memo, dated 21 January 2026 (s55 Response Document 12), which includes an assessment of key Chapter 24 policies.

I provide the following additional planning assessment in response to the evidence of Messrs Langman and Vivian:

- While in relation to Policy 24.2.1.3 Mr Langman cites the landscape assessment by Ms Gilbert, I note that the application includes the original assessments by Mr Milne and a peer review (that are not acknowledged) and the Landscape Joint Witness Statement and second supplementary statement by Mr Milne that have further relevance to this provision.
- In relation to Policy 24.2.1.4 and as noted above, I agree with Mr Milne's assessment in relation to defensible edges⁵ and consider that the proposal would be seen within the Ayrburn Structure Plan framework of open space. In this regard, I do not agree with Mr Langman's assessment in relation to the defensible edge element of this policy.
- In relation to Policy 24.2.1.16 and as noted above, a draft Light Management Plan (s55 Response Document 21) has been prepared and further comments are provided in section 2.6 below.
- I agree with Mr Langman's assessment in relation to Policy 24.2.2.2 and consider that elements of the proposal like mitigation planting and consent conditions will ensure that effects are compatible with surrounding uses.

2.4 PDP Chapter 28 Natural Hazards

Mr Langman identifies in Attachment 2 to his planning review that Chapter 28 of the PDP has not been assessed by the applicant. The following assessment is provided in relation to policies in Chapter 28 relevant to flood hazard, liquefaction hazard and Alluvial Fan-related risks identified for the site:

- Policy 28.3.1.1, Policy 28.3.1.2 Policy 28.3.1.3, Policy 28.3.1.4 and Policy 28.3.1.11 – Flood and alluvial fan-related risks are assessed in the report by CKL included as Appendix 9 to the application and liquefaction-related risks are assessed in the report by GeoSolve included as Appendix 13. Those expert reports address the relevant matters in these policies, including:
 - Likelihood of hazard events;
 - With reference to relevant guidelines, potential consequences;
 - The potential for exacerbation of risks;

⁵ Page 9, Supplementary Landscape Assessment Memo, dated 9 January 2026 and page 4, Second Supplementary Landscape Assessment Memo, dated 21 January 2026.

- Location of buildings to mitigate effects, and use of natural features and management approaches;
- Avoidance of significant risks.
- Based on the assessments outlined above, there no natural hazards that would preclude the development or necessitate restriction in terms of Policy 28.3.1.6 and Policy 28.3.1.7. Similarly, the expert assessments outlined above demonstrate how relevant risks under Policy 28.3.1.8 are avoided or mitigated.
- In terms of Policy 28.3.1.9, no natural hazards with unknown risks have been identified that would necessitate a precautionary approach. In relation to Policy 28.3.2.2 the Natural Hazards Database has been addressed and in relation to Policy 28.3.2.4 a Flood Emergency Hazard Management Plan has been prepared as is included as Appendix 13 to the application.

2.5 PDP Chapter 29 Transport

Mr Langman identifies in Attachment 2 to his planning review that a more fulsome assessment of specific objectives and policies in Chapter 29 of the PDP should be provided by the applicant. The following assessment is provided in relation to those provisions in Chapter 29 relevant to the proposal:

- Appendix 39 to the application includes a thorough assessment of the Chapter 29 provisions that I consider to be relevant to the proposal. In particular, Objective 29.2.2 relating to parking, loading, access, and onsite manoeuvring and Objective 29.2.4 relating to managing subdivision, land use, and the transport network.
- Objective 29.2.1, Objective 29.2.3 and supporting policies relate to the transport network, roads and the road corridor. Other than in relation to the upgrade to the ALHR/Speargrass Flat Road intersection and proposed bus stop (which are addressed principally in relation to Objective 29.2.2), I consider that these provisions are not engaged by the proposed screen hub development proposal.

2.6 Lighting

Mr Langman raises the matter of up-lighting in terms of Rule 24.5.17 – Glare and Policy 24.2.1.16 of the PDP.⁶

The Draft Light Management Plan dated 8 January 2026 ((s55 Response Document 21) provides a comprehensive assessment of the proposal in relation to the various technical requirements for lighting required by the PDP, AS/NZS4282 and Southern Light Strategy. Implementation of the Draft Light Management Plan is included in the proposed amended consent conditions, which include changes to those originally proposed in relation to lighting. I note at section 2.3 the Draft Light Management Plan states:

This LMP proposes conditions which exceed the performance requirements of the District Plan, AS/NZS 4282, Southern Light and the previously proposed conditions and in particular aim to address concerns over sky-glow.

⁶ Marcus Langman planning review paragraph 38 and in Attachment 2 in relation to Policy 24.2.1.16]

Further, in relation to amenity considerations, I note that the 2.4m acoustic barrier proposed along the edge of the carpark (also in the proposed amended consent conditions) would shield vehicle lights from facing properties to the south.

In reliance on the Draft Light Management Plan and shielding of vehicle headlights by the acoustic barrier, I consider that the proposal will appropriately address lighting issue and ensure it is consistent with the relevant PDP provisions.

2.7 National Policy Statement on Indigenous Biodiversity

As noted above in section 2.1.3 in relation to PDP Objective 4.2.2 B, Mr Langman raises the matter of the National Policy Statement on Indigenous Biodiversity (NPS-IB).⁷ This is noted at paragraph [6] of Panel Minute 6, dated 18 December 2025.

The Terrestrial Ecology Assessment dated 15 January 2026 (Attachment 2) and Lizard and Incidental Fauna Assessment dated 5 January 2026 (Attachment 3) address indigenous biodiversity.

In relation to the NPS-IB, the Terrestrial Ecology Assessment finds at section 5.0:

The site is not an identified significant natural area (SNA) and there is no indigenous vegetation present, therefore there is no requirement to apply the effects management hierarchy for any effects on vegetation under the National Policy Statement for Indigenous Biodiversity (NPSIB; MfE 2025b).

There is currently only poor quality habitat at the site for all of the highly mobile fauna listed in Appendix 2 of the NPSIB. Restoration of wetlands and waterways is likely to improve and maintain habitats at the site for these species by increasing the cover of indigenous vegetation and improving the quality of aquatic habitats.

The proposed restoration of waterways and wetlands aligns with the restoration objectives of the NPSIB (s.3.21) by prioritising (b) rare ecosystems [freshwater wetlands], (c) connectivity and buffering functions, and (d) natural inland wetlands.

And it concludes at section 6.0:

Overall effects on terrestrial vegetation are likely to be positive, as vegetation clearance comprises exotic species, and the proposed native plantings more than compensate for any loss of values during construction.

Overall effects on birds are also likely to be positive, given the generally poor-quality habitat that is present prior to construction, the proposed enhancement and plantings of the ephemeral waterway which will improve habitat quality, and the proposed retention of pastoral land on Christine's Hill and adjacent to Arrowtown-Lake Hayes Road.

The Lizard and Incidental Fauna Assessment reports sighting of McCann's skinks over the flat parts of the site where the bulk of development will occur at relatively lower densities than unaffected areas of the wider site, but no geckos were identified or suspected as being present and no significant habitat is affected. A condition relating to a detailed lizard survey and preparation of a management plan is recommended, which is included in the amended proposed conditions.

⁷ Ibid, paragraph 64.

On the basis of these assessments, I consider that the proposal does not raise any issues of concern in relation to the NPS-IB and PDP objectives and policies relating to indigenous biodiversity.

2.8 Te Ao Mārama Inc. Cultural Impact Assessment Conditions

At paragraph 54 Mr Langman states:

...the conditions proposed do not implement the full range of recommended conditions, and involvement in management plans, as sought in the Final Cultural Impact Statement, dated July 2025 (submitted 18 November 2025) by Te Ao Mārama Inc .

However, the comments by Te Ao Mārama Inc. under s53(3) of the FTAA state:

Te Ao Mārama Inc. is the author of the Cultural Impact Assessment submitted by the applicant as part of their application. There are conditions contained within the application that address the impact of the proposed activity on the identified cultural values outlined in that Cultural Impact Assessment. To change these conditions at this stage could potentially undermine the relationship and mitigation measures put in place to address the concerns of iwi.

Overall, the purpose of this letter of comment is to preserve the ability for Ngāi Tahu ki Murihiku (via Te Ao Mārama) to be involved in potential changes to established and agreed conditions. We therefore request that should any changes to conditions occur Ngāi Tahu ki Murihiku is actively engaged and consulted.

2.9 Landscape and Visual Effects

In addition to the PDP-related assessments addressed above, I note that Mr Langman provides an assessment of landscape and visual effects at paragraphs 40-48 of his 12 December 2025 planning review. In relation to this matter, I note that since Mr Langman’s planning review, the following have been prepared:

- Landscape Peer Review by Bridget Gilbert dated 17 December 2025;
- Supplementary Landscape Assessment Memo by Tony Milne dated 9 January 2026 (s55 Response Document 10);
- Peer Review: Supplementary Assessment by Shannon Bray dated 14 January 2026 (s55 Response Document 11);
- JWS Landscape dated 16 January 2026; and
- Second Supplementary Landscape Assessment Memo by Tony Milne dated 21 January 2026 (s55 Response Document 12).

Having regard to the above, I provide the following additional comments to that in the planning assessments provided with the application:

- The comments by Mr Langman at paragraphs 40 and 41⁸ seem to be an assessment of planning provisions rather than landscape and visual effects. In addition to the analysis in application planning assessments, I have addressed the relevant PDP provisions above in response to Mr Langman and Mr Vivian.

⁸ Relating to “the pattern of anticipated development from a spatial planning point of view”.

- Beyond the above, I understand that in relation to landscape and visual effects Mr Langman relies on the draft review by Bridget Gilbert.⁹ Having read the landscape assessments referred to above, I understand there to be differences in opinion between the experts in relation to landscape and visual effects.
- From a planning perspective and as set out at sections 9.1.1 and 9.2.2 of the Ayrburn Screen Hub Planning Report dated 18 November 2025, my assessment is that the approach taken is one involving the careful location of built form mostly within an area anticipated for residential development, supported by landform, planting and architectural treatment to minimise effects but that there will be landscape-related impacts. In summary of the landscape and visual effects as assessed by the experts, I understand that these range from a higher end (Ms Gilbert - 'more than minor' but not 'significant') to a lower end (Mr Milne - 'less than minor' to 'minor').

3.0 Planting and Amenity

3.1 Planning Assessment of Consents Required for Additional Mitigation Measures

Mitigation measures and associated consent conditions are proposed to address matters raised in comments by neighbours to the south of the proposal. These include a barrier for acoustic/lighting screening purposes and the removal of conifers and replacement native planting, as shown in the following additional plans:

- South Neighbours Additional Mitigation Plan dated 21 January 2026 (s55 Response Document 15);
- Wilding Tree Removal and Proposed Native Planting Plan dated 21 January 2026 (s55 Response Document 16);
- Southern Boundary Bank Planting Specification and Maintenance Plan dated 21 January 2026 (s55 Response Document 18).

These mitigation measures require additional consents under the PDP. I confirm that the consents required under PDP, as outlined in paragraph 28d of the Applicant's response, are as follows:

- Restricted discretionary activity consent pursuant to Rule 24.4.18 for the construction of buildings (which include fences exceeding 2m in height) not otherwise provided for in Table 24.1.
- Non-complying activity consent pursuant to Rule 24.4.27.1 for any building (namely the fence) within Activity Area OS.
- Non-complying activity consent pursuant to Rule 24.4.27.6 for the planting of vegetation other than pasture grass, crops or grapevines (namely the planting shown in the mitigation plans referenced above) within any Activity Area OS.

As set out in Section 6.1.1 of the Ayrburn Screen Hub Planning Report dated 18 November 2025, elements of the proposal as submitted required consents under these PDP rules. I provide the following assessment of these consents from a planning perspective:

⁹ I understand this to be the final draft version dated 4 December 2025, which has the same overall assessment and conclusions as the 17 December 2025 peer review including with the QLDC section 53 comments.

- The purpose of conifer removal and native re-planting is principally to mitigate an existing effect from the existence of conifers. In these respects, there will be positive effects. The replacement planting (or existing vegetation, should it be retained) will continue to mitigate views of the proposed Screen Hub buildings and the acoustic/headlight barrier from the adjoining properties.
- I consider the assessment of the Screen Hub buildings and planting in sections 9.1.1 to 9.1.2 on pages 66 to 66 and in section 9.2.2 on page 84 of the Planning Assessment dated 18 November 2025 to apply to the planting and barriers. Similarly, I consider the relevant assessment in terms of Chapter 24 of the PDP made in the Planning Assessment dated 18 November 2025 and in section 2.3 above to apply to the planting and barriers.

I note that in terms of the subdivision under RM240982, the planting and fence in my view would be captured by the proposed amendments to the conditions of RM240982 and thus not require further consents or changes to the subdivision consent.

3.2 Additional Engineered Batter and Plant Establishment Memoranda

The engineered batter planting memorandum by Geosolve (s55 Response Document 9) and the plant establishment memorandum (s55 Response Document 14) have been prepared to address concerns raised by Ms Gilbert about leaving the design of this aspect of the project to the detailed design stage.¹⁰ In my view these additional memoranda provide confidence to support the assumption at paragraph 4.5 of Ms Gilbert's peer review "that a sympathetic retaining system can be designed that allows for the successful establishment of the plantings intended in this part of the development".

Similarly, the revised Depth Contour Plan by Patersons (s55 Response Document 13) addresses the discrepancy identified by Ms Gilbert at paragraph 4.6 of the Landscape Peer Review between the Appendix 20 Depth Contour Plan and the Existing Contours Plan/Proposed Contour Overlay Plan. In doing so, the updated plan supports the assumption by Ms Gilbert that the new spur landform can sympathetically married in with the existing contours.

4.0 Amendments to Proposed Conditions

The applicant has prepared amendments to the proposed draft conditions to address matters arising from comments made under section 53 of the FTAA. These are included as Documents 24-26 (being tracked change/comments box, clean and Word version respectively) to the Applicant's section 55 Response Bundle.

I note that the following conditions are addressed in the Legal Memorandum and other than noting they raise no concern from a planning perspective make no further comment on them:

- New conditions 36A to 36C, regarding water supply;
- Deletion of condition 67, regarding staging; and
- New condition 67 and amended conditions 68-69, regarding use of accommodation units.

Further, as noted in comments boxes in the tracked change version of the amended proposed conditions in Document 24, I note that several changes have been made in response to comments by QLDC. Apart from

¹⁰ Bridget Gilbert landscape peer review, paragraphs 4.2 and 4.4 on pages 11 and 12.

a couple of minor suggested changes to the amendments suggested in the QLDC section 53 comments, as identified, all of QLDC's suggested amendments have been incorporated, including:

- Amendments to condition 1 (updates to addition documents);
- Amendments to conditions 7, 9, 15a), h), j) and k), 17, 18, 22, 30, 31-36, 62, 65 (minor updates);
- Deletion of conditions 46-54 (road upgrade);
- Changes to conditions 55-59 (landscaping);
- Deletion of condition 70 (bus stop); and
- Amendments to conditions 71-73 (public access).

In addition to the tracked change comments boxes in Document 21, I provide comments on the following conditions:

- New conditions 37A-37J, changes to conditions 39-42 and new 42A-42B conditions (and deletion of condition 43) are proposed following the acoustic peer review process and in response to comments by neighbours;
- New conditions 59A-59C are proposed to provide a framework for implementation of the removal of the conifers and associated replanting with indigenous vegetation;
- Replacement and new conditions 60-61A are proposed in response to the Light Management Plan (Document 20); and
- New condition 86A is proposed as recommended in the Lizard and Incidental Fauna Assessment (Document 4).

I provide the following comments on conditions referenced in the planning evidence of Mr Vivian:

- Regarding condition 62, this has been agreed with QLDC and I consider it to be appropriate to provide flexibility for QLDC certification of any amendments to building materials or colours; and
- In relation to conditions 68-69, changes are proposed, as addressed in Legal Memorandum (Document 1). I consider the proposed conditions, as amended, to be appropriate from a planning perspective.